

ESTTA Tracking number: **ESTTA451658**

Filing date: **01/17/2012**

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

Proceeding	91197243
Party	Plaintiff IOIP Holdings, LLC
Correspondence Address	GERARD T GALLAGHER BARNES & THORNBURG LLP 100 N MICHIGAN STREET , 600 1ST SOURCE BANK CENTER SOUTH BEND, IN 46601 UNITED STATES jerry.gallagher@btlaw.com, michelle.horvath@btlaw.com
Submission	Plaintiff's Notice of Reliance
Filer's Name	D. Michael Anderson
Filer's e-mail	michelle.horvath@btlaw.com
Signature	/D. Michael Anderson/
Date	01/17/2012
Attachments	Notice of Reliance1.pdf (11 pages)(197202 bytes) Notice of Reliance2.pdf (20 pages)(959756 bytes) Notice of Reliance3.pdf (17 pages)(204509 bytes) Notice of Reliance4.pdf (24 pages)(262050 bytes) Notice of Reliance5.pdf (20 pages)(301020 bytes) Notice of Reliance6.pdf (20 pages)(315437 bytes) Notice of Reliance7.pdf (19 pages)(981895 bytes) Notice of Reliance8.pdf (18 pages)(453284 bytes) Notice of Reliance9.pdf (18 pages)(464711 bytes) Notice of Reliance10.pdf (16 pages)(344280 bytes) Notice of Reliance11.pdf (16 pages)(1388921 bytes) Notice of Reliance12.pdf (18 pages)(1427172 bytes) Notice of Reliance13.pdf (14 pages)(235797 bytes) Notice of Reliance14.pdf (16 pages)(521662 bytes)

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

Opposition No.: 91197243

IOIP Holdings, LLC,)	
)	
Opposer,)	
)	
v.)	Trademark Application Serial No. 77/648,190
)	
Ontel Products Corporation,)	
)	
Applicant.)	

OPPOSER’S NOTICE OF RELIANCE

Please take notice that pursuant to Rules 2.122 and 2.120 of the Trademark Rules of Practice, Section 704 of the Trademark Trial and Appeal Board Manual of Procedure (“TBMP”), the Federal Rules of Evidence, and the Federal Rules of Civil Procedure, Opposer, IOIP Holdings, LLC (“Opposer”), intends to rely on the following documents as evidence in support of its case:

1. Opposer relies on any documents or deposition transcripts identified by Applicant as its trial evidence or in its notice of reliance, to the extent they are admissible into evidence.
2. Pursuant to Trademark Rule 2.122(d)(2), Opposer relies on the following U.S. Trademark Registrations owned by Opposer, as shown in the certified copies of the Certificates of Registration and abstracts of title records: Reg. No. 2,366,983 for LIME OUT, Reg. No. 0693,672 for IRON OUT, Reg. No. 1,917,128 for DRAIN OUT, Reg. No. 1,537,090 for IRON OUT, Reg. No. 1,914,442 for IRON OUT, Reg. No. 1,986,001

for YELLOW OUT, Reg. No. 1,976,124 for RUST OUT, Reg. No. 1,505,474 for RUST OUT, and Reg. No. 2,685,393 for WHIRL OUT (collectively, "Opposer's Marks").

3. Opposer relies on Applicant's U.S. Trademark Application Ser. No. 77/648,190 for the mark OUT and the Trademark Office's file concerning same, pursuant to Trademark Rule 2.122(b), for any relevant and competent purpose, including to show the goods that Applicant intends to offer and sell under Applicant's OUT mark, the similarity of Applicant's mark in sound, meaning, appearance and overall commercial impression to Opposer's Marks, the similarity of Applicant's goods as listed in Applicant's trademark application to the goods listed in Opposer's trademark registrations for its Marks, and the similarity of the trade channels and consumers of the parties' respective goods.

4. Opposer relies on its First Interrogatories to Applicant.

5. Opposer relies on its First Request for Production of Documents to Applicant.

6. Opposer relies on its Requests for Admission to Applicant.

7. Opposer relies on Applicant's Response to Opposer's Requests for Admission to Applicant.

8. Opposer relies on Applicant's Response to Opposer's First Set of Interrogatories to Applicant.

9. Opposer relies on Applicant's Response to Opposer's First Set of Requests for the Production of Documents and Things to Applicant.

10. Opposer relies on certain marketing materials produced by Applicant in connection with Applicant's Response to Opposer's First Set of Requests for the Production of Documents and Things to Applicant, namely documents bates-labeled

“ONT0001” through “ONT0005.” These documents are relevant to show the goods that Applicant offers and sells under Applicant’s OUT mark, the similarity of Applicant’s mark in sound, meaning, appearance and overall commercial impression to Opposer’s Marks, the similarity of Applicant’s goods to the goods listed in Opposer’s trademark registrations for its Marks, the similarity of the trade channels, price, consumers, and retail and on-line outlets of the parties’ respective goods, the uses for Applicant’s goods, the functions of Applicant’s goods, the offering of Applicant’s goods for sale, and Applicant’s product packaging and marketing of its goods offered for sale under its OUT mark. Applicant admits the genuineness and authenticity of these documents in its Response to Opposer’s Request for Admission no. 1.

11. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of Opposer’s website, which is bates-labeled “IOIP001941” through “IOIP002002.” Opposer’s website is publicly available at www.summitbrands.com. The website is relevant to show the nature of Opposer’s goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer’s goods, the uses for Opposer’s goods, the functions of Opposer’s goods, the offering of Opposer’s goods for sale, Opposer’s emphasis of the “out” portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer’s Marks.

12. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer Menards’ website, which are bates-labeled “IOIP002003” through “IOIP002007,” and “IOIP002012” through “IOIP002016.” The website is publicly available at www.menards.com. The website is relevant to show the nature of Opposer’s

goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

13. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer Wal-Mart's website, which are bates-labeled "IOIP002009" through "IOIP002010," "IOIP002033," and "IOIP2037" through "IOIP2040." The website is publicly available at www.walmart.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

14. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer Orsheln Farm & Home's website, which are bates-labeled "IOIP002018" and "IOIP002024" through "IOIP002028." The website is publicly available at www.orschelnfarmhome.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the

offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

15. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer Aubuchon Hardware's website, which is bates-labeled "IOIP002020" through "IOIP002023." The website is publicly available at www.hardwarestore.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

16. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer Ace Hardware's website, which is bates-labeled "IOIP002030" through "IOIP002031." The website is publicly available at www.acehardware.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

17. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer Lowe's website, which are bates-labeled "IOIP002035" and "IOIP002056" through "IOIP002059." The website is publicly available at www.lowes.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

18. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer Tractor Supply Co.'s website, which is bates-labeled "IOIP002036." The website is publicly available at www.tractorsupply.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

19. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer K-Mart's website, which is bates-labeled "IOIP002041" through "IOIP002042." The website is publicly available at www.kmart.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer

base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

20. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of retailer Sam's Club's website, which is bates-labeled "IOIP002043" through "IOIP002051." The website is publicly available at www.samsclub.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

21. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 10/27/2011 printout of portions of Do it Best retail hardware stores' website, which is bates-labeled "IOIP002053" through "IOIP002054." The website is publicly available at www.doitbest.com. The website is relevant to show the nature of Opposer's goods, its success in the marketplace, customer base, consumers for its goods, marketing channels, channels of trade, retail outlets for its goods, current packaging of Opposer's goods, the uses for Opposer's goods, the functions of Opposer's goods, the offering of Opposer's goods for sale, Opposer's emphasis of the "out" portion of its Marks in product

packaging and marketing, and the strength and goodwill associated with Opposer's Marks.

22. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 1/17/12 print out of Applicant's web page located at the URL www.ontelproducts.com/retailpartners.asp. The web page is publicly available at this URL. The web page is relevant to show the similarity of the trade channels and retail outlets and consumers of the parties' respective goods offered under Opposer's Mark and Applicant's OUT mark. Applicant admits in its Responses to Opposer's Request for Admission nos. 3, 5 and 6 that the web page represents Applicant's goods can be found at some of the retail outlets reflected in the web page, the web page appearing at the URL www.ontelproducts.com/retail is Applicant's web page, and Applicant's goods can be found in some of the outlets reflected on the web page.

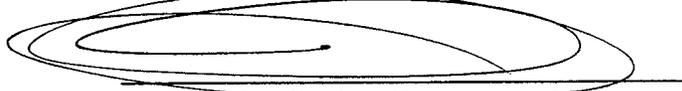
23. Pursuant to Trademark Rule 2.122(e), Opposer relies on the 1/17/12 print out of Applicant's web page located at the URL www.outpaste.com. The web page is publicly available at the URL www.outpaste.com/ver2/index.asp. These documents are relevant to show the goods that Applicant offers and sells under Applicant's OUT mark, the similarity of Applicant's goods to the goods listed in Opposer's trademark registrations for its Marks, the similarity of the trade channels, price, consumers, and on-line outlets of the parties' respective goods, the uses for Applicant's goods, the functions of Applicant's goods, the offering of Applicant's goods for sale, and Applicant's product packaging and marketing of its goods offered for sale under its OUT mark. Applicant states in its response to Opposer's Interrogatory no. 9 that the web site located at the URL

www.oupaste.com is a web site that it set up and uses to advertise and promote its goods in connection with its OUT mark.

Dated: January 17, 2012

Respectfully submitted,

BARNES & THORNBURG LLP



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D. Michael Anderson, Esq.
BARNES & THORNBURG, LLP
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100 North Michigan
South Bend, Indiana 46601
Telephone: (574) 233-1171
Fax: (574) 237-1125
jerry.gallagher@btlaw.com
mike.anderson@btlaw.com

Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on Jason M. Drangel, Epstein, Drangel, Bazerman & James, LLP, 60 East 42nd Street, Suite 2410, New York, NY 10165, on the 17th day of January, 2012, by first class mail, postage prepaid.



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

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
)
 v.)
)
Ontel Products Corporation,)
)
 Applicant.)

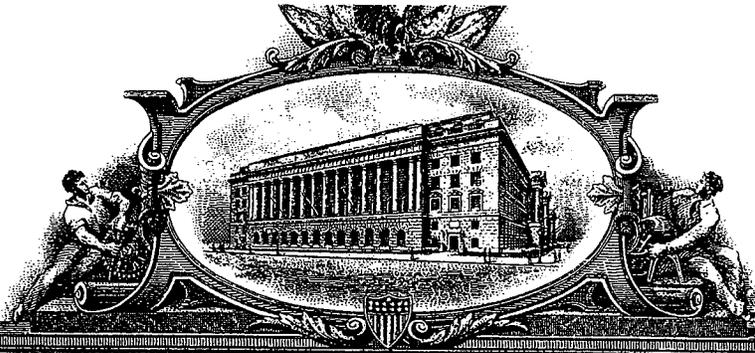
Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 2

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

December 16, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 2,366,983 IS
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 10 YEARS FROM *July 11, 2000*
1st RENEWAL FOR A TERM OF 10 YEARS FROM *July 11, 2010*
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC

A LIMITED LIABILITY CORPORATION OF INDIANA

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

W. Montgomery
W. MONTGOMERY
Certifying Officer



Int. Cl.: 3

Prior U.S. Cls.: 1, 4, 6, 50, 51, and 52

Reg. No. 2,366,983

United States Patent and Trademark Office

Registered July 11, 2000

**TRADEMARK
PRINCIPAL REGISTER**

LIME OUT

IRON OUT, INC. (INDIANA CORPORATION)
1515 DIVIDEND ROAD
FORT WAYNE, IN 468081126

FOR: GENERAL PURPOSE PREPARATIONS FOR
PREVENTING AND REMOVING MINERAL DEPOS-
ITS, IN CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND
52).

FIRST USE 1-1-2000; IN COMMERCE 1-1-2000.
NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT
TO USE "LIME", APART FROM THE MARK AS
SHOWN.

SN 75-521,438, FILED 7-20-1998.

GERALD C. SEEGARS, EXAMINING ATTORNEY

Int. Cl.: 3

Prior U.S. Cls.: 1, 4, 6, 50, 51, and 52

Reg. No. 2,366,983

United States Patent and Trademark Office

Registered July 11, 2000

**TRADEMARK
PRINCIPAL REGISTER**

LIME OUT

**IRON OUT, INC. (INDIANA CORPORATION)
1515 DIVIDEND ROAD
FORT WAYNE, IN 468081126**

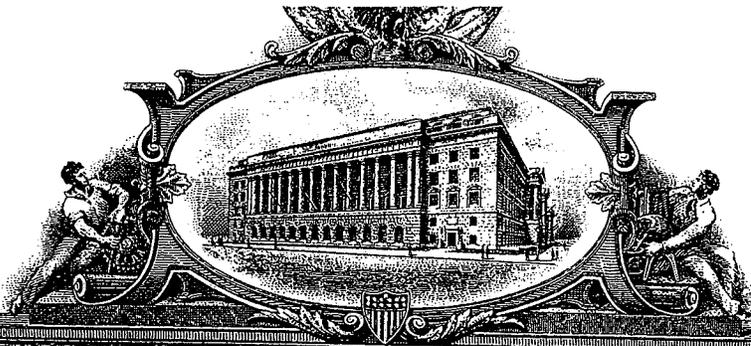
**FIRST USE 1-1-2000; IN COMMERCE 1-1-2000.
NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT
TO USE "LIME", APART FROM THE MARK AS
SHOWN.**

**FOR: GENERAL PURPOSE PREPARATIONS FOR
PREVENTING AND REMOVING MINERAL DEPOS-
ITS, IN CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND
52).**

SN 75-521,438, FILED 7-20-1998.

GERALD C. SEEGARS, EXAMINING ATTORNEY

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

December 20, 2011

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EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 10 YEARS FROM *September 05, 1995*
1st RENEWAL FOR A TERM OF 10 YEARS FROM *September 05, 2005*
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC

AN INDIANA LIMITED LIABILITY CORPORATION

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

N. WILLIAMS

Certifying Officer



Int. Cl.: 3

Prior U.S. Cls.: 1, 4, 6, 50, 51, and 52

United States Patent and Trademark Office

Reg. No. 1,917,128
Registered Sep. 5, 1995

**TRADEMARK
PRINCIPAL REGISTER**

DRAIN OUT

IRON OUT, INC. (INDIANA CORPORATION)
1515 DIVIDEND ROAD
FORT WAYNE, IN 468081126

FIRST USE 2-0-1995; IN COMMERCE
2-0-1995.

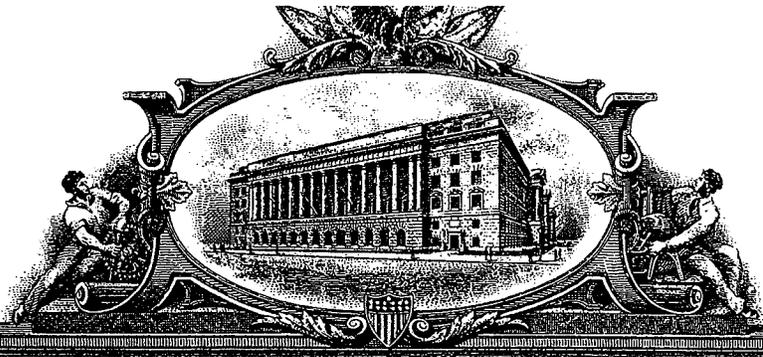
OWNER OF U.S. REG. NOS. 693,672, 1,505,474,
AND 1,537,090.

FOR: DRAIN OPENERS AND SEWER
CLEANING PREPARATIONS, IN CLASS 3 (U.S.
CLS. 1, 4, 6, 50, 51 AND 52).

SN 74-486,127, FILED 2-3-1994.

W. A. CONN, EXAMINING ATTORNEY

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

December 16, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 693,672 IS
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND
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THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *March 01, 1960*
3rd RENEWAL FOR A TERM OF 10 YEARS FROM *March 01, 2010*
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC

LIMITED LIABILITY CORPORATION OF INDIANA

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

W. Montgomery
W. MONTGOMERY
Certifying Officer



United States Patent Office

693,672
Registered Mar. 1, 1960

PRINCIPAL REGISTER Trademark

Ser. No. 71,374, filed Apr. 13, 1959

IRON OUT

Jack E. Harter, doing business as Fort Wayne Water
Treatment
2305 Spy Run
Fort Wayne, Ind.

For: CHEMICAL COMPOUND FOR USE IN RE-
MOVING FOREIGN MATTER FROM WATER
SOFTENERS, in CLASS 6.

First use Dec. 17, 1958; in commerce Dec. 17, 1958.



United States Patent Office

693,672
Registered Mar. 1, 1960

PRINCIPAL REGISTER
Trademark

Ser. No. 71,374, filed Apr. 13, 1959

IRON OUT

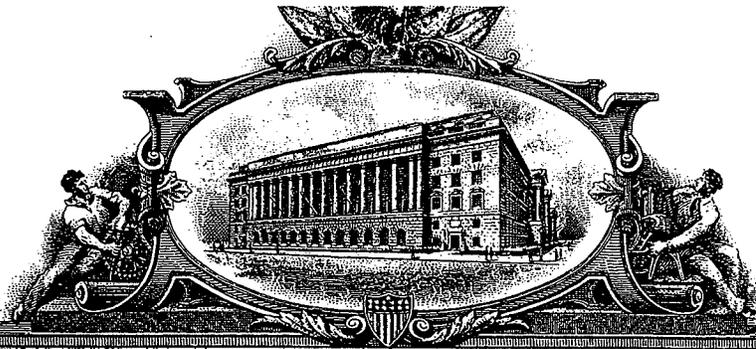
Jack E. Harter, doing business as Fort Wayne Water
Treatment
2305 Spy Run
Fort Wayne, Ind.

For: CHEMICAL COMPOUND FOR USE IN RE-
MOVING FOREIGN MATTER FROM WATER
SOFTENERS, in CLASS 6.
First use Dec. 17, 1958; in commerce Dec. 17, 1958.

COMB. AFF. SEC 8 & 15

MAY - 5 1965

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

December 16, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,537,090 IS
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *May 02, 1989*
1st RENEWAL FOR A TERM OF 10 YEARS FROM *May 02, 2009*
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC

A LIMITED LIABILITY CORPORATION OF INDIANA

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

W. Montgomery
W. MONTGOMERY
Certifying Officer



Int. Cl.: 1

Prior U.S. Cl.: 6

United States Patent and Trademark Office

Reg. No. 1,537,090

Registered May 2, 1989

**TRADEMARK
PRINCIPAL REGISTER**

IRON OUT

**IRON OUT, INC. (INDIANA CORPORATION)
2417 SPY RUN
FORT WAYNE, IN 46805**

**FIRST USE 1-31-1964; IN COMMERCE
1-31-1964.
OWNER OF U.S. REG. NO. 693,672.**

**FOR: ALL PURPOSE RUST AND STAIN RE-
MOVER FOR USE IN WATER SYSTEMS, SUCH
AS TOILETS, PIPES, PUMPS, AND WATER
CONDITIONERS, IN CLASS 1 (U.S. CL. 6).**

**SER. NO. 747,497, FILED 8-22-1988.
PATRICIA L. WILLIAMS, EXAMINING AT-
TORNEY**

Int. Cl.: 1

Prior U.S. Cl.: 6

United States Patent and Trademark Office

Reg. No. 1,537,090

Registered May 2, 1989

**TRADEMARK
PRINCIPAL REGISTER**

IRON OUT

IRON OUT, INC. (INDIANA CORPORATION)
2417 SPY RUN
FORT WAYNE, IN 46805

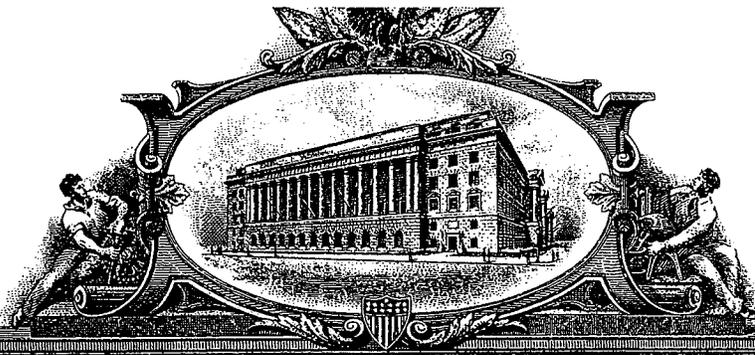
FIRST USE 1-31-1964; IN COMMERCE
1-31-1964.
OWNER OF U.S. REG. NO. 693,672.

FOR: ALL PURPOSE RUST AND STAIN RE-
MOVER FOR USE IN WATER SYSTEMS, SUCH
AS TOILETS, PIPES, PUMPS, AND WATER
CONDITIONERS, IN CLASS 1 (U.S. CL. 6).

SER. NO. 747,497, FILED 8-22-1988.

PATRICIA L. WILLIAMS, EXAMINING AT-
TORNEY

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

December 20, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,914,442 IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 10 YEARS FROM *August 29, 1995*
1st RENEWAL FOR A TERM OF 10 YEARS FROM August 29, 2005
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC

AN INDIANA LIMITED LIABILITY CORPORATION

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

N. WILLIAMS

Certifying Officer



Int. Cl.: 3

Prior U.S. Cls.: 1, 4, 6, 50, 51 and 52

United States Patent and Trademark Office

Reg. No. 1,914,442

Registered Aug. 29, 1995

**TRADEMARK
PRINCIPAL REGISTER**

IRON OUT

**IRON OUT, INC. (INDIANA CORPORATION)
1515 DIVIDEND ROAD
FORT WAYNE, IN 468081126**

**FOR: ALL-PURPOSE RUST AND IRON
STAIN REMOVER FOR - WHITENING,
BRIGHTENING AND REMOVING STAINS
FROM CLOTHING; REMOVING STAINS FROM
TUBS, SINKS, CHROME, CERAMIC TILE,
SHOWERS, AND LIKE ITEMS; REMOVING
STAINS FROM DISHES, GLASSWARE, PLAS-
TICWARE, AND LIKE ITEMS; REMOVING
STAINS FROM BRICK, STONE, CONCRETE**

**AND OTHER EXTERIOR SURFACES; AND RE-
MOVING STAINS FROM DISHWASHERS AND
WASHING MACHINES, IN CLASS 3 (U.S. CLS.
1, 4, 6, 50, 51 AND 52).**

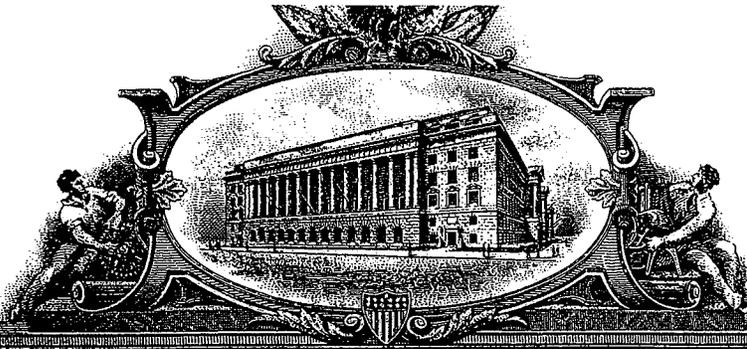
**FIRST USE 1-31-1964; IN COMMERCE
1-31-1964.**

**OWNER OF U.S. REG. NOS. 693,672 AND
1,537,090.**

SER. NO. 74-546,367, FILED 7-6-1994.

LINDA E. BLOHM, EXAMINING ATTORNEY

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

December 20, 2011

**THE ATTACHED U.S. TRADEMARK REGISTRATION 1,986,001 IS
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES
PATENT AND TRADEMARK OFFICE.**

**REGISTERED FOR A TERM OF 10 YEARS FROM July 09, 1996
1st RENEWAL FOR A TERM OF 10 YEARS FROM July 09, 2006
SECTION 8 & 15**

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC

AN INDIANA LIMITED LIABILITY CORPORATION

**By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office**

N. WILLIAMS

Certifying Officer



Int. Cl.: 3

Prior U.S. Cls.: 1, 4, 6, 50, 51, and 52

United States Patent and Trademark Office

Reg. No. 1,986,001

Registered July 9, 1996

**TRADEMARK
PRINCIPAL REGISTER**

YELLOW OUT

IRON OUT, INC. (INDIANA CORPORATION)
1515 DIVIDEND ROAD
FORT WAYNE, IN 468081126

FOR: CLEANER FOR REMOVING HARD
WATER STAINS, RUST STAINS AND IRON
STAINS FROM CLOTHING, IN CLASS 3 (U.S.
CLS. 1, 4, 6, 50, 51 AND 52).

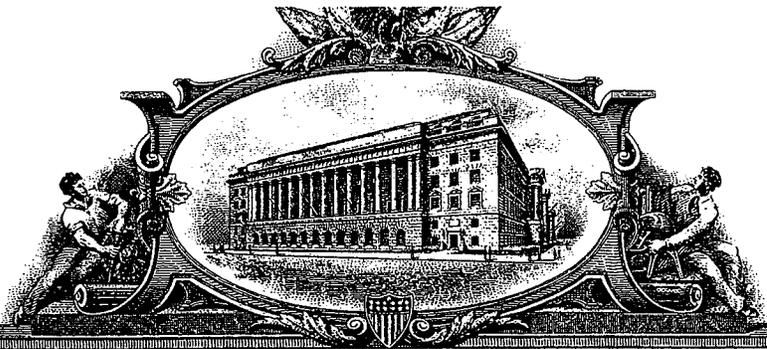
FIRST USE 8-31-1994; IN COMMERCE
8-31-1994.

OWNER OF U.S. REG. NOS. 693,672, 1,505,474,
AND 1,537,090.

SN 74-456,575; FILED 11-5-1993.

W. A. CONN, EXAMINING ATTORNEY

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

December 20, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,976,124 IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 10 YEARS FROM *May 28, 1996*
1st RENEWAL FOR A TERM OF 10 YEARS FROM *May 28, 2006*
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC
AN INDIANA LIMITED LIABILITY CRPORATION

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

N. WILLIAMS
Certifying Officer



Int. Cl.: 3

Prior U.S. Cls.: 1, 4, 6, 50, 51 and 52

United States Patent and Trademark Office

Reg. No. 1,976,124

Registered May 28, 1996

**TRADEMARK
PRINCIPAL REGISTER**

RUST OUT

**IRON OUT, INC. (INDIANA CORPORATION)
1515 DIVIDEND ROAD
FORT WAYNE, IN 46808**

**FOR: ALL-PURPOSE RUST AND STAIN RE-
MOVER FOR USE IN TOILET BOWLS, FLUSH
TANKS, SINKS AND BOWLS, DISHWASHERS
AND WASHING MACHINES, AND FOR
WHITE CLOTHING, DISHES AND GLASS-
WARE, BRICK, STONE, OR CONCRETE EXTE-
RIOR SURFACES, TUBS, CHROME, CERAMIC
TILE, SHOWER STALLS AND THE LIKE, IN
CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND 52).**

**FIRST USE 2-19-1988; IN COMMERCE
2-19-1988.**

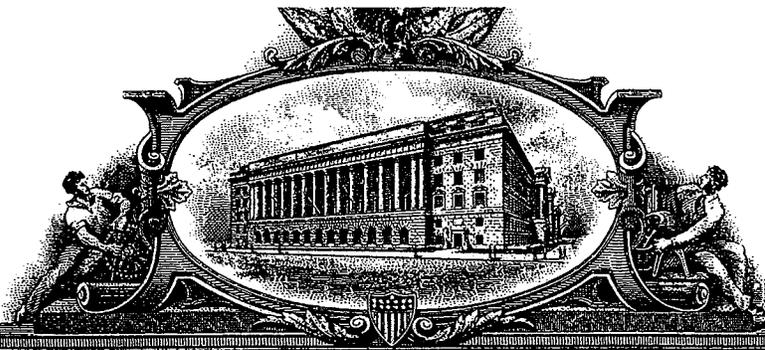
OWNER OF U.S. REG. NO. 1,505,474.

**NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "RUST", APART FROM THE
MARK AS SHOWN.**

SER. NO. 74-629,592, FILED 2-3-1995.

**DOMINICK J. SALEMI, EXAMINING ATTOR-
NEY**

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

December 16, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,505,474 IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

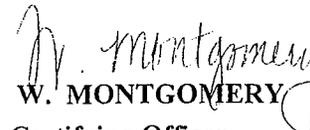
REGISTERED FOR A TERM OF 20 YEARS FROM *September 27, 1988*
1st RENEWAL FOR A TERM OF 10 YEARS FROM *September 27, 2008*
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC

A LIMITED LIABILITY CORPORATION OF INDIANA

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office


W. MONTGOMERY
Certifying Officer



Int. Cl.: 1

Prior U.S. Cl.: 6

United States Patent and Trademark Office **Reg. No. 1,505,474**
Registered Sep. 27, 1988

**TRADEMARK
PRINCIPAL REGISTER**

RUST OUT

IRON OUT, INC. (INDIANA CORPORATION)
2417 SPY RUN
FORT WAYNE, IN 46802

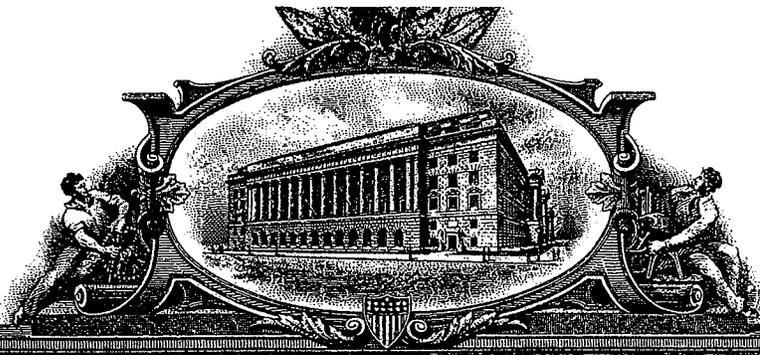
FIRST USE 0-0-1958; IN COMMERCE
0-0-1958.

SER. NO. 712,142, FILED 2-19-1988.

FOR: CHEMICAL COMPOUND FOR USE IN
REMOVING FOREIGN MATTER FROM
WATER SOFTENERS, IN CLASS 1 (U.S. CL. 6).

MICHAEL A. SZOKE, EXAMINING ATTOR-
NEY

7330121



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

December 16, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 2,685,393 IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 10 YEARS FROM *February 11, 2003*
SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

IOIP HOLDINGS, LLC

A LIMITED LIABILITY CORPORATION OF INDIANA

**By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office**


W. MONTGOMERY
Certifying Officer



Int. Cl.: 1

Prior U.S. Cls.: 1, 5, 6, 10, 26 and 46

United States Patent and Trademark Office

Reg. No. 2,685,393

Registered Feb. 11, 2003

**TRADEMARK
PRINCIPAL REGISTER**

WHIRL OUT

IRON OUT, INC. (INDIANA CORPORATION)
1515 DIVIDEND ROAD
FORT WAYNE, IN 468081126

NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "WHIRL", APART FROM THE
MARK AS SHOWN.

FOR: MOLD, MILDEW, DEPOSIT, AND CORRO-
SION INHIBITOR FOR WHIRLPOOL BATHS, HOT
TUBS AND JETTED BATHTUBS, IN CLASS 1 (U.S.
CLS. 1, 5, 6, 10, 26 AND 46).

SER. NO. 76-189,353, FILED 1-3-2001.

FIRST USE 8-13-1999; IN COMMERCE 8-13-1999.

DAWN HAN, EXAMINING ATTORNEY

Int. Cl.: 1

Prior U.S. Cls.: 1, 5, 6, 10, 26 and 46

Reg. No. 2,685,393

United States Patent and Trademark Office

Registered Feb. 11, 2003

**TRADEMARK
PRINCIPAL REGISTER**

WHIRL OUT

**IRON OUT, INC. (INDIANA CORPORATION)
1515 DIVIDEND ROAD
FORT WAYNE, IN 468081126**

**NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "WHIRL", APART FROM THE
MARK AS SHOWN.**

**FOR: MOLD, MILDEW, DEPOSIT, AND CORROSION
INHIBITOR FOR WHIRLPOOL BATHS, HOT
TUBS AND JETTED BATHTUBS, IN CLASS 1 (U.S.
CLS. 1, 5, 6, 10, 26 AND 46).**

SER. NO. 76-189,353, FILED 1-3-2001.

FIRST USE 8-13-1999; IN COMMERCE 8-13-1999.

DAWN HAN, EXAMINING ATTORNEY

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

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
)
 v.)
)
Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 4

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

_____)	
IOIP HOLDINGS, LLC)	
)	
Opposer,)	
)	
v.)	
)	Trademark App. Ser. No. 77/648,190
)	Opposition No. 91197243
ONTEL PRODUCTS COMPANY)	
)	
Applicant.)	
_____)	

OPPOSER’S FIRST INTERROGATORIES TO APPLICANT

Opposer, IOIP Holdings, LLC (“Opposer”), pursuant to FRCP 26 and 33 and Trademark Rules 2.116(a) and 2.120(d), hereby serves the following interrogatories to Applicant, Ontel Products Corporation (“Applicant”), to be answered separately and fully in writing under oath by Applicant. Each separately numbered or lettered sub-part of each interrogatory requires a separate answer. Furthermore, these interrogatories shall be deemed continuing pursuant to FRCP 26(e)(2).

Definitions and Instructions

Opposer’s interrogatories, requests for production and requests for admission are subject to the definitions set forth below:

A. For purposes of these interrogatories, the term “document” shall be deemed to include each original, copy, draft or other version of any kind of any paper, writing, drawing, chart, photograph, record, recording, transcript, data compilation from which information can be obtained or translated through any means, or other written, recorded or graphic matter, however

produced or reproduced, whether sent or received or neither, and all copies thereof (whether or not different in any way from the original by interlineation, receipt stamp, notation, indication of copies sent or received, or otherwise), and includes, by way of illustration only and not by way of limitation, the following: notes; communications of any nature, including correspondence, telegrams, e-mails, memoranda, and summaries of records of personal conversations; phone messages; notebooks of any character; diaries, receipts, telephone logs, pamphlets, brochures, routing slips or memoranda; reports, mailings, publications; reports or summaries of investigations, agreements and contracts, including modifications and revisions; drafts of, revisions of and translations of any documents.

B. If Applicant refuses to identify and/or produce document(s) based upon a claim of confidentiality, privilege, or work product immunity, Applicant shall identify and describe each document as required under the applicable rules.

C. "Applicant's Products/Services" shall refer to those goods and/or services offered, intended to be offered, advertised, and/or rendered or sold in connection with the OUT trademark which is the subject of Trademark App. Ser. No. 77/648,190.

D. "Opposer's Products/Services" shall refer to those goods and/or services listed in Opposer's following United States Trademark Registrations:

IRON OUT	U.S. Trademark Reg. No. 693,672
RUST OUT	U.S. Trademark Reg. No. 1,505,474
IRON OUT	U.S. Trademark Reg. No. 1,537,090
IRON OUT	U.S. Trademark Reg. No. 1,914,442
DRAIN OUT	U.S. Trademark Reg. No. 1,917,128
RUST OUT	U.S. Trademark Reg. No. 1,976,124
YELLOW OUT	U.S. Trademark Reg. No. 1,986,001
LIME OUT	U.S. Trademark Reg. No. 2,366,983
WHIRL OUT	U.S. Trademark Reg. No. 2,685,393

E. "Applicant" shall mean Ontel Products Corporation, along with any predecessor, successor, parent, affiliate or subdivision of Applicant, as well as any entity, person or business through or by which Applicant claims, in whole or in part, rights or interests in the trademark/service mark OUT as reflected in U.S. Trademark App. Ser. No. 77/648,190.

F. "Relating to" means constituting, defining, describing, containing, discussing, embodying, reflecting, identifying, stating, referring to, dealing with, associated with or in any way pertaining to.

G. The word "identify" when used with respect to a person or persons means (1) to state the name, address(es) and telephone number(s) of each such person; (2) to note the name of the present employer(s), place of employment and job title, if any, of each such person; and (3) if such person was affiliated at any time with any party to this litigation, by employment or otherwise, to state the nature (including job title, if any) and dates of such affiliation.

H. The word "identify" when used with respect to a document or documents means: (1) to specify the nature of the document (such as, for example, letter, memorandum, etc.); (2) to state the date, if any, appearing on the document, or if none, the date upon which such document was prepared; (3) to describe in general the subject matter of the document; (4) to identify each person who wrote, signed, dictated, or otherwise participated in the preparation of the document; (5) to identify each person, if any, who was an addressee thereof; and (6) if it now exists, to identify each person having custody of the document.

I. The words "individual(s)" and "person(s)" means all individuals and entities, including without limitation, all individuals, sole proprietorships, associations, companies, partnerships, joint ventures, corporations, trusts and estates.

J. The word "or" means "and/or."

K. The word “any” includes the collective as well as the singular and means “each”, “all” and “every”, all of which terms are interchangeable.

L. “Applicant’s Mark” shall mean the “OUT” trademark which is the subject of United States Trademark App. Ser. No. 77/648,190, or any similar term, name, symbol or device that Applicant is relying upon or may rely upon as a basis for defending against this opposition action or supporting concurrent use proceedings or objecting to registration of Opposer’s Marks (defined below).

M. “Opposer’s Marks” shall mean the following trademarks:

IRON OUT	U.S. Trademark Reg. No. 693,672
RUST OUT	U.S. Trademark Reg. No. 1,505,474
IRON OUT	U.S. Trademark Reg. No. 1,537,090
IRON OUT	U.S. Trademark Reg. No. 1,914,442
DRAIN OUT	U.S. Trademark Reg. No. 1,917,128
RUST OUT	U.S. Trademark Reg. No. 1,976,124
YELLOW OUT	U.S. Trademark Reg. No. 1,986,001
LIME OUT	U.S. Trademark Reg. No. 2,366,983
WHIRL OUT	U.S. Trademark Reg. No. 2,685,393

Interrogatories

1. State the date on which Applicant first sold or offered any goods or services under Applicant’s Mark in commerce in the United States, specifying the exact date, exact mark, the nature of the goods or services offered or sold, the place or places where the goods or services were offered or sold, and the person or entity to whom or which the goods or services were offered or sold.

RESPONSE:

2. Specify each product or service ever sold or offered by Applicant under or in connection with Applicant's Mark, and state the years in which Applicant sold and/or offered the products and/or services.

RESPONSE:

3. For each product or service identified in response to Interrogatory No. 2, provide the estimated prices at which the product or service was sold or offered since Applicant first adopted Applicant's Mark and the approximate annual gross revenue realized by Applicant for the product or service in each year since Applicant first adopted Applicant's Mark.

RESPONSE:

4. State the types or class of consumers to whom Applicant promotes and/or sells (or intends to promote or sell, if Applicant has not begun use) products or services under or in connection with Applicant's Mark.

RESPONSE:

5. For each year that Applicant has sold the products and/or services identified in Applicant's answer to Interrogatory No. 2, state the channels of distribution and specific geographical areas within which Applicant's Products/Services were sold.

RESPONSE:

6. For each year that Applicant has promoted the products and/or services identified in Applicant's answer to Interrogatory No. 2, state the channels of distribution and specific geographical areas within which Applicant's Products/Services were promoted, as well as the specific means by which Applicant's Products/Services were promoted each year.

RESPONSE:

7. Identify with particularity each instance known to Applicant where any person expressed a belief, question or concern that Applicant or Applicant's Products/Services may be related to, connected, affiliated or associated with Opposer or Opposer's Products/Services or vice versa.

RESPONSE:

8. Identify with particularity each instance known to Applicant wherein any person has been confused, mistaken or deceived as to the origin, sponsorship, or approval of Opposer's products, services, or commercial activities by Applicant or vice versa.

RESPONSE:

9. For each year since Applicant first formed a bona fide intent to use Applicant's Mark, identify each medium in which Applicant has advertised or promoted Applicant's Products/Services in connection with Applicant's Mark, the inclusive dates of each advertisement and/or promotion, the individual(s) employed or associated with Applicant who was responsible implementing or procuring same, and the specific area of geographical distribution or broadcast of the advertisement and/or promotion.

RESPONSE:

10. For each year since Applicant first formed a bona fide intent to use Applicant's Mark, state the approximate annual dollar amount of advertising spent for advertising goods and/or services offered (or intended to be offered) by Applicant under or in connection with Applicant's Mark, providing a breakdown of such advertising by various advertising media, the geographical area in which the advertising was distributed or broadcast, and the nature of the goods and/or services advertised.

RESPONSE:

11. For each year since Applicant first formed a bona fide intent to use Applicant's Mark, state the approximate annual dollar amount spent by Applicant promoting Applicant's Mark or the goods and/or services offered (or intended to be offered) by Applicant in connection with Applicant's Mark, providing a breakdown of such dollars by various promotional means, geographical area in which the goods and/or services were promoted, and nature of the goods and/or services promoted.

RESPONSE:

12. State the date and circumstances under which Applicant first learned of Opposer's Mark or Opposer's use of Opposer's Mark.

RESPONSE:

13. With respect to the date and circumstances stated in Applicant's answer to Interrogatory No. 12, describe any investigation or research conducted by or on behalf of Applicant as a direct and proximate result of learning of Opposer's Mark, the inclusive dates of the investigation or research, the identity of the person(s) or entity(ies) who conducted the investigation or research, the substance of what Applicant learned as a result of the investigation or research, and what actions (if any) Applicant took as a direct and proximate result of learning of Applicant's Mark.

RESPONSE:

14. Identify each search or investigation conducted to assess the registrability of Applicant's Mark, or to assess whether use of Applicant's Mark might infringe upon the trademark rights of others, state the inclusive date(s) of each such search or investigation, identify the person(s) or entity(ies) who conducted the investigation or search, and state the results of the search or investigation.

RESPONSE:

15. If Applicant has objected in whole or in part to use or application for registration in the United States of a trademark or service mark by others, for each such instance identify:

- (a) The objecting person or entity, and the person or party using the objectionable mark;
- (b) The forum, if any, in which Applicant filed an objection, and the cancellation or opposition number, if any;
- (c) The mark or marks or words which were objected to;
- (d) The direct result of such objections; and

- (e) The identity of all documents which reference or concerns the objections or the resolution of the objections.

RESPONSE:

16. If Applicant has ever entered into any co-existence agreement or settlement agreement relating to Applicant's Mark, state:

- (a) the identity of each party to the agreement;
- (b) The date of the agreement; and
- (c) the marks and the products or services that are the subject of the agreement.

RESPONSE:

17. State whether Applicant's Mark has been the subject of any question, suggestion or allegation of infringement, either informally or through an administrative proceeding or civil action, and if so, for each such claim identify:

- (a) The person or entity questioning, suggesting or alleging the infringement;
- (b) The mark upon which the person or entity based its question, suggestion or allegation of infringement;
- (c) The direct result of the question, suggestion or allegation of infringement; and
- (d) The identity of all documents which reference or concern the question, suggestion or allegation of infringement.

RESPONSE:

18. Identify all of Applicant's past and present trademark registrations or applications (federal or state) for Applicant's Mark or variations thereof.

RESPONSE:

19. State the geographical region in which Applicant intends to sell and market for sale goods and/or services in connection with Applicant's Mark.

RESPONSE:

20. Identify any testifying expert employed by Applicant in connection with this proceeding and state the subject matter on which he/she is expected to testify, the substance of the facts and opinions to which each such expert is expected to testify, a summary of the grounds for each such opinion, and whether such expert has rendered any written report.

RESPONSE:

21. For each year since Applicant adopted Applicant's Mark, state the geographical region to which Applicant targeted the sales and marketing of its goods and services in connection with Applicant's Mark and the efforts made by Applicant to promote and sell its goods and services in the geographical region.

RESPONSE:

22. Describe Applicant's current intentions with respect to expansion or contraction (geographically and/or in the scope of goods and services offered for sale) of its business conducted under Applicant's Mark.

RESPONSE:

23. Identify all licensing, consent and distribution agreements involving use or contemplated use of Applicant's Mark.

RESPONSE:

24. Identify the trade associations and professional associations in which Applicant is a member and the inclusive dates of such memberships.

RESPONSE:

25. As to each trade or professional show, meeting, convention, or other gathering in the United States at which Applicant has exhibited or promoted its products and/or services in connection with Applicant's Mark, identify the name of each such show, meeting or convention, where it was held and the dates when held.

RESPONSE:

26. State all facts supporting Applicant's denial of the allegations contained in Paragraph 5 of Opposer's *Notice of Opposition*.

RESPONSE:

27. State all facts supporting Applicant's denial of the allegations contained in Paragraph 6 of Opposer's *Notice of Opposition*.

RESPONSE:

28. State all facts supporting Applicant's denial of the allegations contained in Paragraph 7 of Opposer's *Notice of Opposition*.

RESPONSE:

29. State all facts supporting Applicant's denial of the allegations contained in Paragraph 9 of Opposer's *Notice of Opposition*.

RESPONSE:

30. State all facts supporting Applicant's denial of the allegations contained in Paragraph 13 of Opposer's *Notice of Opposition*.

RESPONSE:

31. Identify all consumer surveys, studies or market research conducted by or on behalf of Applicant relating to Applicant's Mark or Opposer's Mark.

RESPONSE:

32. State by inclusive dates all periods of non-use of Applicant's Mark by Applicant since Applicant first adopted Applicant's Mark and the reason(s) for such non-use.

RESPONSE:

33. For each telephone call that Applicant and/or Applicant's counsel had with an examining attorney at the United States Patent and Trademark Office in connection with prosecuting Applicant's United States Trademark App. Ser. No. 77/648,190, including but not limited to any telephone call placed between the time Applicant's *Request for Reconsideration* was denied on May 27, 2010 and Applicant's Mark was approved for publication on June 1, 2010, state:

- (a) The date of the telephone call;
- (b) What the examining attorney said;
- (c) What Applicant and/or Applicant's counsel said;
- (d) The approximate duration of the telephone call;
- (e) The identities, addresses, telephone numbers and e-mail addresses of the persons participating in the telephone call;
- (f) The identity of the person(s) placing the call;
- (g) The purpose of the call; and
- (h) The actions, if any, taken by the examining attorney and/or Trademark Office in response to the telephone call.

34. Identify those persons who provided information for responding to these Interrogatories.

RESPONSE:

Verification

I affirm, under penalties for perjury, that the answers to the foregoing Interrogatories are true.

Date: _____

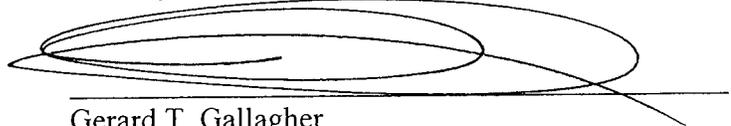
ONTEL PRODUCTS CORPORATION

By: _____

Printed Name: _____

Its: _____

Interrogatories prepared and submitted by:

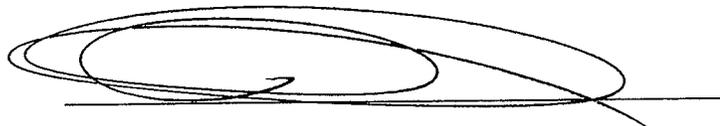


Gerard T. Gallagher
D. Michael Anderson
BARNES & THORNBURG LLP
600 1st Source Bank Center
100 N. Michigan Street
South Bend, IN 46601
Telephone: (574) 233-1171
Facsimile: (574) 237-1125
E-mail: jgallagher@btlaw.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *First Interrogatories to Applicant* was served on the following, via first class mail, postage prepaid, on this 30th day of June, 2011:

Jason M. Drangel
William C. Wright
EPSTEIN DRANGEL LLP
One Grand Central Plaza
60 East 42nd Street, Suite 820
New York, NY 10165



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

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
)
 v.)
)
Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 5

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

_____)	
IOIP HOLDINGS, LLC)	
)	
Opposer,)	
)	
v.)	
)	Trademark App. Ser. No. 77/648,190
)	Opposition No. 91197243
ONTEL PRODUCTS COMPANY)	
)	
Applicant.)	
_____)	

**OPPOSER'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS TO APPLICANT**

Opposer, IOIP Holdings, LLC (“Opposer”), pursuant to FRCP 26 and 34 and Trademark Rules 2.116(a) and 2.120(d), hereby serves the following request for production to Applicant, Ontel Products Corporation (“Applicant”), and requests that Applicant produce the documents and things listed below upon Opposer at the offices of BARNES & THORNBURG LLP, 100 North Michigan St., 600 1st Source Bank Center, South Bend, Indiana 46601.

Definitions and Instructions

The definitions and instructions contained in *Opposer’s First Interrogatories to Applicant* are incorporated herein by reference.

Requests and Responses

1. All documents identified in Applicant’s answers to *Opposer’s First Interrogatories to Applicant*.

RESPONSE:

2. All non-privileged documents referencing or tending to evidence the earliest use and current use of Applicant's Mark with the goods identified in United States Trademark Application Ser. No. 77/648,190.

RESPONSE:

3. All contractual agreements (e.g., licenses, consents, settlements) concerning use or contemplated use of Applicant's Mark by Applicant or others.

RESPONSE:

4. All non-privileged documents reflecting, referencing or tending to evidence any communications between Applicant and others concerning this Opposition, the subject matter of this Opposition, and/or allegations made by Applicant or Opposer in this Opposition.

RESPONSE:

5. Spreadsheets or statements sufficient to identify all information upon which the price, uses, sales volume and revenue figures given in response to Interrogatory No. 3 are based, the manner in which they were calculated, and to prove the accuracy of such price, uses, sales volume and revenue figures.

RESPONSE:

6. Spreadsheets or statements sufficient to identify all information upon which the dollar amounts given in response to Interrogatory No. 10 are based, the manner in which they were calculated, and to prove the accuracy of the dollar amounts.

RESPONSE:

7. Spreadsheets or statements sufficient to identify all information upon which the dollar amounts given in response to Interrogatory No. 11 are based, the manner in which they were calculated, and to prove the accuracy of the dollar amounts.

RESPONSE:

8. All documents referencing or tending to evidence the circumstances of Applicant's development, creation, selection or adoption of Applicant's Mark.

RESPONSE:

9. All documents referencing, concerning or tending to evidence each instance wherein any person has been confused, mistaken or deceived as to the identity of the parties to this proceeding or their respective products or services.

RESPONSE:

10. Representative copies of all advertisements and other promotional or marketing materials prepared by, for, or on behalf of Applicant since Applicant first formed a bona fide intent to use Applicant's Mark, which bear or reflect Applicant's Mark.

RESPONSE:

11. All documents that reference, concern or tend to evidence the use by any person, other than Opposer or Applicant, of the word "OUT," or any colorable imitation of such words as a brand or trade name in connection with the offering of goods or services.

RESPONSE:

12. All documents referencing, concerning or tending to evidence any suggestion or allegations of infringement of Applicant's Mark made by or on behalf of Applicant.

RESPONSE:

13. All documents referencing, concerning or tending to evidence any objections received by Applicant from any third party concerning Applicant's use, application for registration, or registration of Applicant's Mark.

RESPONSE:

14. All documents referencing, concerning or tending to evidence surveys, market studies, focus groups, polls, research or analysis conducted by or on the behalf of Applicant related to Applicant's Mark or Opposer's Mark.

RESPONSE:

15. All documents prepared, sent, received or filed in connection with Applicant's past and present trademark registrations and/or applications (federal or state) for Applicant's Mark, which specifically includes but is not limited to correspondence or notes and other documents or data prepared in connection with telephone calls by Applicant or

Applicant's counsel with examining attorneys at the United States Patent and Trademark Office in connection with Applicant's prosecution of United States Trademark Application Ser. No. 77/648,190.

RESPONSE:

16. Representative brochures or other advertising or marketing materials showing use of Applicant's Mark from the date of first use to date.

RESPONSE:

17. All documents reflecting, referencing, concerning or tending to evidence any press release, newspaper article or other publication which mentions Applicant (or any related company) and/or Applicant's Products/Services or Applicant's Mark.

RESPONSE:

18. Summaries and tabulations of records identifying the publications and media in which Applicant (or any related company) has advertised or is advertising services or products using Applicant's Mark. If summaries or tabulations are unavailable, all records from which such information may be ascertained.

RESPONSE:

19. All documents concerning Applicant's Mark that have been filed with or received from any governmental regulatory agency.

RESPONSE:

20. All documents referencing, concerning or tending to evidence any civil, criminal or administrative action or proceeding involving Applicant's Mark or Applicant's Products/Services, including without limitation any proceeding before the United States Patent and Trademark Office or any state or federal court, or the national advertising division of the Counsel of Better Business Bureaus.

RESPONSE:

21. Documents sufficient to prove each use of Applicant's Mark for different goods or services, and use of Applicant's Mark in different formats, since the date of first use of Applicant's Mark.

RESPONSE:

22. All documents referencing, concerning or tending to evidence the meaning or significance to Applicant of the word "OUT" as its trademark.

RESPONSE:

23. For each year since Applicant first formed a bona fide intent to use Applicant's Mark, documents sufficient to identify the annual dollar volume of advertising spent by Applicant under or in connection with Applicant's Mark, including a breakdown of such advertising by various advertising media and geographical area of dissemination.

RESPONSE:

24. All documents concerning, referencing or tending to evidence Applicant's current plans for expansion or contraction of its business (in terms of geography and/or in the scope of goods and services offered for sale) conducted under Applicant's Mark.

RESPONSE:

25. All documents referencing or tending to evidence Applicant's promotional strategies and plans for Applicant's Products/Services.

RESPONSE:

26. All searches or investigations, including all documents referencing or concerning any search or investigation, of any type conducted by or on behalf of Applicant in connection with its decision to adopt, use or apply for federal or state registration of Applicant's Mark.

RESPONSE:

27. All searches or investigations of any type conducted by or on behalf of Applicant referencing or concerning Opposer's Marks.

RESPONSE:

28. All documents referencing, concerning or tending to evidence any attempt by a third party to assert or enforce its trademark or service mark rights against Applicant's use, application for registration, and/or registration of Applicant's Mark, and any response(s) thereto.

RESPONSE:

29. All documents reflecting, referencing or tending to evidence the facts stated in Applicant's answers to Interrogatory Nos. 27, 28, 29 and 30.

RESPONSE:

30. All documents reflecting, referencing or tending to evidence the facts stated in Applicant's answers to Interrogatory No. 19.

RESPONSE:

31. All documents concerning, referencing or tending to evidence Applicant's first knowledge of Opposer's Mark.

RESPONSE:

32. The complete file and all reports (including all drafts) of any testifying expert employed or retained by Applicant in connection with this proceeding.

RESPONSE:

33. All documents reflecting or referencing all inter partes proceedings and other litigations or disputes in which Applicant is or has been involved regarding Applicant's Mark, as well as any written challenges directed to or by Applicant concerning Applicant's Mark.

RESPONSE:

34. All documents referencing, reflecting or tending to evidence the geographical scope of Applicant's historical and current use of Applicant's Mark since adoption of Applicant's Mark.

RESPONSE:

35. Documents sufficient to identify the historical, current and future scope of geographical use claimed by Applicant under Applicant's Mark in this proceeding.

RESPONSE:

36. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 5 of Opposer's *Notice of Opposition*.

RESPONSE:

37. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 6 of Opposer's *Notice of Opposition*.

RESPONSE:

38. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 7 of Opposer's *Notice of Opposition*.

RESPONSE:

39. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 9 of Opposer's *Notice of Opposition*.

RESPONSE:

40. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 13 of Opposer's *Notice of Opposition*.

RESPONSE:

41. Documents sufficient to identify the particular retailers, such as the "Retail Partners" reflected on Applicant's web page located at the URL: www.ontelproducts.com/retail, which currently offer any of Applicant's goods for sale.

RESPONSE:

42. Documents sufficient to identify the particular retailers, such as the "Retail Partners" reflected on Applicant's web page located at the URL: www.ontelproducts.com/retail, which currently offer Applicant's "OUT" goods for sale.

RESPONSE:

43. For each year that Applicant's "OUT" goods have been offered for sale by the particular retailer(s), documents sufficient to identify, by retailer and year, Applicant's total annual

sales of Applicant's "OUT" goods to each retailer that currently offers and/or has historically offered Applicant's "OUT" goods for sale.

RESPONSE:

44. Documents sufficient to identify the particular retailers, such as the "Retail Partners" reflected on Applicant's web page located at the URL: www.ontelproducts.com/retail, which have in the past offered any of Applicant's goods for sale.

RESPONSE:

45. For each year that Applicant's "OUT" goods were offered for sale by the particular retailer(s), documents sufficient to identify, by retailer and year, Applicant's total annual sales of Applicant's "OUT" goods to each retailer that has in the past offered Applicant's "OUT" goods for sale.

RESPONSE:

46. For each year that the particular retailer has/had offered Applicant's "OUT" goods for sale, documents sufficient to identify, by year and retailer, the total annual sales of Applicant's "OUT" goods by each retailer that currently or has in the past offered Applicant's "OUT" goods for sale.

RESPONSE:

47. All documents referencing, reflecting or tending to evidence the trade channels and/or intended or contemplated trade channels for Applicant's "OUT" goods.

RESPONSE:

48. All documents referencing, reflecting or tending to evidence the class, category, type or demographics of the consumers, targeted consumers, and/or intended consumers of Applicant's "OUT" goods.

RESPONSE:

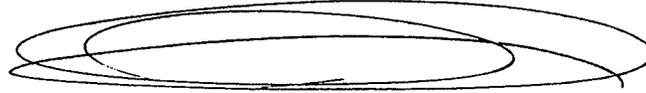
49. All documents referencing, reflecting or tending to evidence Applicant's historical and current retail and product-placement strategies for its "OUT" goods.

RESPONSE:

50. For each year since Applicant first adopted Applicant's Mark, documents sufficient to identify and prove the annual gross revenue realized by Applicant for sales of Applicant's Products/Services offered in connection with Applicant's Mark.

RESPONSE:

Submitted by:



Gerard T. Gallagher
D. Michael Anderson
BARNES & THORNBURG LLP
600 1st Source Bank Center
100 N. Michigan Street
South Bend, IN 46601
Telephone: (574) 233-1171
Facsimile: (574) 237-1125
E-mail: jgallagher@btlaw.com

Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *First Request for Production of Documents to Applicant* was served on the following, via first class mail, postage prepaid, on this 30th day of June, 2011:

Jason M. Drangel
William C. Wright
EPSTEIN DRANGEL LLP
One Grand Central Plaza
60 East 42nd Street, Suite 820
New York, NY 10165



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

Opposition No.: 91197243

IOIP Holdings, LLC,)	
)	
Opposer,)	
)	
v.)	Trademark Application Serial No. 77/648,190
)	
Ontel Products Corporation,)	
)	
Applicant.)	

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 6

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

_____)	
IOIP HOLDINGS, LLC)	
)	
Opposer,)	
)	
v.)	
)	Trademark App. Ser. No. 77/648,190
)	Opposition No. 91197243
ONTEL PRODUCTS COMPANY)	
)	
Applicant.)	
_____)	

OPPOSER'S REQUESTS FOR ADMISSION TO APPLICANT

Opposer, IOIP Holdings, LLC ("Opposer"), hereby requests pursuant to FRCP 36(a) and 26(b)(1) that Applicant, Ontel Products Corporation ("Applicant"), admit, for purposes of this action only, the truth of the matters set forth below:

Definitions and Instructions

The definitions and instructions contained in *Opposer's First Interrogatories to Applicant* are incorporated herein by reference.

Requests

1. Admit the genuineness and authenticity of all documents produced in response to *Opposer's First Request for Production of Documents to Applicant*.

RESPONSE:

2. Admit the genuineness and authenticity of all documents produced in response to *Opposer's First Interrogatories to Applicant*.

RESPONSE:

3. Admit that the web page located at the URL: www.ontelproducts.com/retail represents that Applicant's goods can be found in some of the following retail outlets: Bed Bath & Beyond, BROOKS Pharmacy, CVS, The Home Depot, HSN, Linens-n-Things, Longs Drugs, QVC, Target, Walgreens, Wal-Mart and Belk.

RESPONSE:

4. Admit that the attached **Exhibit A** is a true, accurate and authentic reproduction of the web page appearing at the URL: www.ontelproducts.com/retail.

RESPONSE:

5. Admit that the web page appearing at the URL: www.ontelproducts.com/retail is Applicant's web page.

RESPONSE:

6. Admit that Applicant's goods can be found in some of the following retail outlets: Bed Bath & Beyond, BROOKS Pharmacy, CVS, The Home Depot, HSN, Linens-n-Things, Longs Drugs, QVC, Target, Walgreens, Wal-Mart and Belk.

RESPONSE:

7. Admit that Applicant's Products/Services sold under Applicant's Mark are offered for sale in some of the following retail outlets: Bed Bath & Beyond, BROOKS Pharmacy, CVS, The Home Depot, HSN, Linens-n-Things, Longs Drugs, QVC, Target, Walgreens, Wal-Mart and Belk.

RESPONSE:

8. Admit that Applicant intends for its Products/Services under Applicant's Mark to be offered for sale in some of the following retail outlets: Bed Bath & Beyond, BROOKS Pharmacy, CVS, The Home Depot, HSN, Linens-n-Things, Longs Drugs, QVC, Target, Walgreens, Wal-Mart and Belk.

RESPONSE:

9. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 693,672.

RESPONSE:

10. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,505,474.

RESPONSE:

11. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,537,090.

RESPONSE:

12. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,914,442.

RESPONSE:

13. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,917,128.

RESPONSE:

14. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,976,124.

RESPONSE:

15. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,986,001.

RESPONSE:

16. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 2,366,983.

RESPONSE:

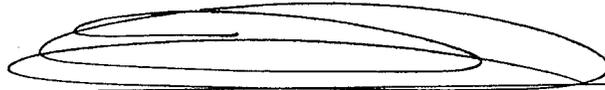
17. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 2,685,393.

RESPONSE:

18. Admit that Applicant's Products/Services are sold, or Applicant intends to sell Applicant's Products/Services, in some of the same trade channels in which Opposer's Products/Services are sold.

RESPONSE:

Requests prepared and submitted by:



Gerard T. Gallagher
D. Michael Anderson
BARNES & THORNBURG LLP
600 1st Source Bank Center
100 N. Michigan Street
South Bend, IN 46601
Telephone: (574) 233-1171
Facsimile: (574) 237-1125
E-mail: jgallagher@btlaw.com

Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *First Requests for Admission to Applicant* was served on the following, via first class mail, postage prepaid, on this 30th day of June, 2011:

Jason M. Drangel
William C. Wright
EPSTEIN DRANGEL LLP
One Grand Central Plaza
60 East 42nd Street, Suite 820
New York, NY 10165



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

Opposition No.: 91197243

IOIP Holdings, LLC,)	
)	
Opposer,)	
)	
v.)	Trademark Application Serial No. 77/648,190
)	
Ontel Products Corporation,)	
)	
Applicant.)	

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 7

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

_____)	
IOIP HOLDINGS, LLC)	
)	
Opposer,)	
)	
v.)	
)	Trademark App. Ser. No. 77/648,190
)	Opposition No. 91197243
ONTEL PRODUCTS CORP.)	
)	
Applicant.)	
_____)	

RESPONSE TO OPPOSER’S REQUESTS FOR ADMISSION TO APPLICANT

Applicant Ontel Products Corp. (“Ontel” or “Applicant”) responds to Opposer’s IOIP Holdings LLC’s (“Opposer”) requests that Applicant admit or deny the truth of the statements set forth below as follows:

I. GENERAL OBJECTIONS

Applicant hereby asserts the following General Objections and incorporates its General Objections in each of the individual responses set forth below:

1. Applicant objects to each Admission Request in Opposer’s First Set of Admissions to the extent it imposes obligations on Applicant beyond those required by the Federal Rules of Civil Procedure.

2. Applicant objects to each Admission Request to the extent it seeks information protected by the attorney-client privilege, the work-product doctrine, or any other privilege or evidentiary principle available under federal or state statutory, constitutional, or common law.

Nothing in Applicant's responses to Opposer's Admission Requests is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, work-product doctrine, or any other privilege or evidentiary principle available under federal or state statutory, constitutional, or common law.

3. Applicant objects to each Admission Request to the extent that it purports to require Applicant to disclose confidential or proprietary business information concerning itself or a third party or the content of any part of any agreement between Applicant and a third party which by its terms may not be disclosed by Applicant. Applicant will not disclose any such information absent the consent of the third party in question or the entry of a protective order by the Board.

4. Applicant objects to each Admission Request to the extent that it seeks information that is not in the possession, custody, or control of Applicant.

5. Applicant objects to each Admission Request as being unduly burdensome to the extent it seeks information that is a matter of public record or that is equally available to Opposer from other sources.

6. Applicant objects to each Admission Requests to the extent that it seeks information that could be obtained more efficiently through other methods of discovery.

7. Applicant objects to each Admission Request to the extent it asks for duplicative or cumulative information.

8. Applicant objects to each Admission Request as unduly burdensome insofar as it may be construed to require Applicant to create or compile documents or things.

9. Applicant objects to each Admission Request to the extent that it requires interpretation and application of the legal conclusions and contentions of the parties.

10. Applicant objects to each Admission Request to the extent that it calls for information that is not now known by or reasonably available from sources within the custody or control of Applicant. Applicant's search for information is ongoing. Applicant reserves the right to rely on facts, documents, or other evidence that may develop or come to Applicant's attention at a later time, or that are produced by the other party in or third parties to this action. Applicant's responses are based on information presently known to Applicant and are set forth without prejudice to Applicant's right to assert additional objections and/or provide supplemental responses should Applicant discover additional grounds for objections or additional documents or information. Applicant reserves the right to supplement or amend its responses to Opposer's Admission Requests at any time prior to the trial(s) of this proceeding.

11. Applicant's responses and objections are made solely for the purpose of discovery in this action. Nothing herein is intended to waive the following objections, which are expressly reserved: all objections as to competency, relevancy, materiality, and admissibility of the subject matter of the Admission Requests; all objections as to vagueness, ambiguity, or undue burden; all objections to the use of any information, document or things identified or provided in response to these Interrogatories; all objections to any request for further responses to these or other discovery requests; all objections to the privileged or work-product nature of any information, document or thing; and any other objections which would require or permit the exclusion from evidence of any information, document or things provided in response to these Admission Requests, all of which objections are reserved and may be interposed at the time of trial.

Requests

1. Admit the genuineness and authenticity of all documents produced in response to *Opposer's First Request for Production of Documents to Applicant.*

RESPONSE: Admitted.

2. Admit the genuineness and authenticity of all documents produced in response to *Opposer's First Interrogatories to Applicant.*

RESPONSE: Admitted.

3. Admit that the web page located at the URL: www.ontelproducts.com/retail represents that Applicant's goods can be found in some of the following retail outlets: Bed Bath & Beyond, BROOKS Pharmacy, CVS, The Home Depot, HSN, Linens-n-Things, Longs Drugs, QVC, Target, Walgreens, Wal-Mart and Belk.

RESPONSE: Admitted

4. Admit that the attached **Exhibit A** is a true, accurate and authentic reproduction of the web page appearing at the URL: www.ontelproducts.com/retail.

RESPONSE: Admitted.

5. Admit that the web page appearing at the URL: www.ontelproducts.com/retail is Applicant's web page.

RESPONSE: Admitted.

6. Admit that Applicant's goods can be found in some of the following retail outlets: Bed Bath & Beyond, BROOKS Pharmacy, CVS, The Home Depot, HSN, Linens-n-Things, Longs Drugs, QVC, Target, Walgreens, Wal-Mart and Belk.

RESPONSE: Admitted.

7. Admit that Applicant's Products/Services sold under Applicant's Mark are offered for sale in some of the following retail outlets: Bed Bath & Beyond, BROOKS Pharmacy, CVS, The Home Depot, HSN, Linens-n-Things, Longs Drugs, QVC, Target, Walgreens, Wal-Mart and Belk.

RESPONSE: Denied.

8. Admit that Applicant intends for its Products/Services under Applicant's Mark to be offered for sale in some of the following retail outlets: Bed Bath & Beyond, BROOKS Pharmacy, CVS, The Home Depot, HSN, Linens-n-Things, Longs Drugs, QVC, Target, Walgreens, Wal-Mart and Belk.

RESPONSE: Denied.

9. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 693,672.

RESPONSE: Denied.

10. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,505,474.

RESPONSE: Denied.

11. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,537,090.

RESPONSE: Denied.

12. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,914,442.

RESPONSE: Denied.

13. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,917,128.

RESPONSE: Denied.

14. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,976,124.

RESPONSE: Denied.

15. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 1,986,001.

RESPONSE: Denied.

16. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 2,366,983.

RESPONSE: Denied.

17. Admit that the description of Applicant's goods in its United States Trademark App. Ser. No. 77/648,190 encompasses the goods described in Opposer's United States Trademark Reg. No. 2,685,393.

RESPONSE: Denied.

18. Admit that Applicant's Products/Services are sold, or Applicant intends to sell Applicant's Products/Services, in some of the same trade channels in which Opposer's Products/Services are sold.

RESPONSE: Denied.

Date: 7/29/11

ONTEL PRODUCTS CORPORATION

By: 

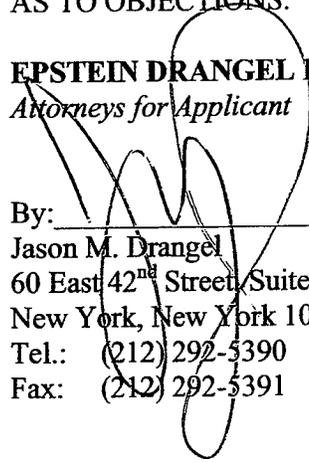
Name: Ian R. Fried

Its: In-house counsel

AS TO OBJECTIONS:

EPSTEIN DRANGEL LLP
Attorneys for Applicant

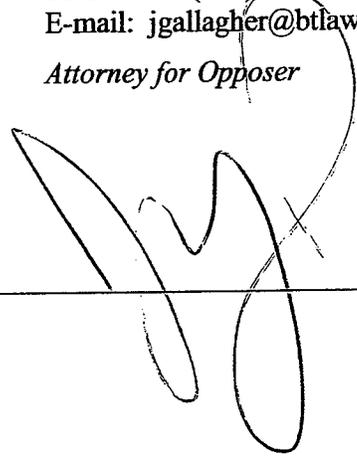
Dated: 7/29/11
New York, New York

By: 
Jason M. Drangel
60 East 42nd Street, Suite 2410
New York, New York 10165
Tel.: (212) 292-5390
Fax: (212) 292-5391

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Response to First Requests for Admission to Applicant* was served on the following, via first class mail, postage prepaid, on this 29 day of July, 2011:

Gerard T. Gallagher
D. Michael Anderson
BARNES & THORNBURG LLP
600 1st Source Bank Center
100 N. Michigan Street
South Bend, IN 46601
Telephone: (574) 233-1171
Facsimile: (574) 237-1125
E-mail: jgallagher@btlaw.com
Attorney for Opposer



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

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
)
 v.)
)
Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 8

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

_____)	
IOIP HOLDINGS, LLC)	
)	
Opposer,)	
)	
v.)	
)	Trademark App. Ser. No. 77/648,190
)	Opposition No. 91197243
ONTEL PRODUCTS CORPORATION)	
)	
Applicant.)	
_____)	

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

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Ontel Products Corporation (hereinafter "Ontel" or "Applicant") hereby responds to Opposer, IOIP HOLDINGS, LLC (hereinafter "Opposer") First Set of Interrogatories.

General Objections

Ontel hereby asserts the following General Objections and incorporates its General Objections in each of the individual responses set forth below:

1. Ontel objects to each definition, instruction, and Interrogatory in the First Set of Interrogatories to the extent it imposes obligations on Ontel beyond those required by the Federal Rules of Civil Procedure.

2. Ontel objects to each definition, instruction, and Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work-product doctrine, or any other privilege or evidentiary principle available under federal or state statutory, constitutional,

or common law. Nothing in Ontel's responses to Interrogatories is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, work-product doctrine, or any other privilege or evidentiary principle available under federal or state statutory, constitutional, or common law.

3. Ontel objects to each definition, instruction, and Interrogatory to the extent that it purports to require Ontel to disclose confidential or proprietary business information concerning itself or a third party or the content of any part of any agreement between Ontel and a third party which by its terms may not be disclosed by Ontel. Ontel will not disclose any such information absent the consent of the third party in question or pursuant to the terms of the Protective Order entered in this action.

4. Ontel objects to each definition, instruction, and Interrogatory to the extent that it seeks information that is not in the possession, custody, or control of Ontel.

5. Ontel objects to each definition, instruction, and Interrogatory as being unduly burdensome to the extent it seeks information that is a matter of public record or that is equally available to Opposer from other sources.

6. Ontel objects to each definition, instruction, and Interrogatory to the extent that it seeks information that could be obtained more efficiently through other methods of discovery.

7. Ontel objects to each definition, instruction, and Interrogatory to the extent it asks for duplicative or cumulative information.

8. Ontel objects to each definition, instruction, and Interrogatory as unduly burdensome insofar as it may be construed to require Ontel to create or compile documents or things.

9. Ontel objects to each definition, instruction, and Interrogatory to the extent that it

requires interpretation and application of the legal conclusions and contentions of the parties.

10. Ontel objects to each definition, instruction, and Interrogatory to the extent that it contains any factual or legal misrepresentation.

11. Ontel objects to each definition, instruction, and Interrogatory to the extent that it calls for information that is not now known by or reasonably available from sources within the custody or control of Ontel. Ontel 's search for information is ongoing. Ontel reserves the right to rely on facts, documents, or other evidence that may develop or come to Ontel's attention at a later time, or that are produced by the other party in or third parties to this action. Ontel's responses are based on information presently known to Ontel and are set forth without prejudice to Ontel's right to assert additional objections and/or provide supplemental responses should Ontel discover additional grounds for objections or additional documents or information. Ontel reserves the right to supplement or amend its responses to the Interrogatories at any time prior to the trial(s) of this proceeding. Any statement made herein is not an admission of any factual or legal contention contained in any Interrogatory.

12. Ontel 's responses and objections are made solely for the purpose of discovery in this action. Nothing herein is intended to waive the following objections, which are expressly reserved: all objections as to competency, relevancy, materiality, and admissibility of the subject matter of the Interrogatories; all objections as to vagueness, ambiguity, or undue burden; all objections to the use of any information, document or things identified or provided in response to these Interrogatories; all objections to any request for further responses to these or other discovery requests; all objections to the privileged or work-product nature of any information, document or thing; and any other objections which would require or permit the exclusion from evidence of any information, document or things provided in response to these Interrogatories,

all of which objections are reserved and may be interposed at the time of trial.

Subject to and without waiver of these General Objections, Ontel responds to the Interrogatories as follows:

Interrogatories

1. State the date on which Applicant first sold or offered any goods or services under Applicant's Mark in commerce in the United States, specifying the exact date, exact mark, the nature of the goods or services offered or sold, the place or places where the goods or services were offered or sold, and the person or entity to whom or which the goods or services were offered or sold.

RESPONSE: First goods (cleaning paste) using mark OUT were offered for sale by Ontel using a direct response television commercial airing May 16, 2009 on national cable, regional cable and local broadcast channels.

2. Specify each product or service ever sold or offered by Applicant under or in connection with Applicant's Mark, and state the years in which Applicant sold and/or offered the products and/or services.

RESPONSE: Cleaning pastes sold from 2009 to present.

3. For each product or service identified in response to Interrogatory No. 2, provide the estimated prices at which the product or service was sold or offered since Applicant first adopted Applicant's Mark and the approximate annual gross revenue realized by Applicant for the product or service in each year since Applicant first adopted Applicant's Mark.

RESPONSE: Price: 3 tubes for \$19.99 plus shipping and handling (\$6.99), 2 tubes for \$19.99 plus shipping and handling (\$6.99), 2 tubes for \$10 plus shipping and handling (\$6.99). Ontel has sold an estimated \$27,831.00 of products since 2009.

4. State the types or class of consumers to whom Applicant promotes and/or sells (or intends to promote or sell, if Applicant has not begun use) products or services under or in connection with Applicant's Mark.

RESPONSE: All individual consumers.

5. For each year that Applicant has sold the products and/or services identified in Applicant's answer to Interrogatory No. 2, state the channels of distribution and specific geographical areas within which Applicant's Products/Services were sold.

RESPONSE: Goods have been sold in the U.S., Japan and Italy through direct response television and internet marketing.

6. For each year that Applicant has promoted the products and/or services identified in Applicant's answer to Interrogatory No. 2, state the channels of distribution and specific geographical areas within which Applicant's Products/Services were promoted, as well as the specific means by which Applicant's Products/Services were promoted each year.

RESPONSE: Goods have been sold and promoted in the U.S., Italy and Japan through direct response television marketing campaigns on broadcast, national cable, regional and local television and online.

7. Identify with particularity each instance known to Applicant where any person expressed a belief, question or concern that Applicant or Applicant's Products/Services may be related to, connected, affiliated or associated with Opposer or Opposer's Products/Services or vice versa.

RESPONSE: None.

8. Identify with particularity each instance known to Applicant wherein any person has been confused, mistaken or deceived as to the origin, sponsorship, or approval of Opposer's products, services, or commercial activities by Applicant or vice versa.

RESPONSE: None.

9. For each year since Applicant first formed a bona fide intent to use Applicant's Mark, identify each medium in which Applicant has advertised or promoted Applicant's Products/Services in connection with Applicant's Mark, the inclusive dates of each advertisement and/or promotion, the individual(s) employed or associated with Applicant who was responsible implementing or procuring same, and the specific area of geographical distribution or broadcast of the advertisement and/or promotion.

RESPONSE: Ontel has set up and used the Internet website www.outpaste.com since May 2009. A direct response television advertising campaign has also run intermittently since May 2009. The commercial has run in Italy, Japan and the United States. Karen How, Ontel's Vice President of Direct Response Marketing, directed Ontel's domestic marketing campaign.

10. For each year since Applicant first formed a bona fide intent to use Applicant's Mark, state the approximate annual dollar amount of advertising spent for advertising goods and/or services offered (or intended to be offered) by Applicant under or in connection with Applicant's Mark, providing a breakdown of such advertising by various advertising media, the geographical area in which the advertising was distributed or broadcast, and the nature of the goods and/or services advertised.

RESPONSE: The following confidential information regarding advertising expenditures is being provided on a confidential basis:

2009 US Television ads: \$67,987.00
2010 US Television ads \$3,988.00
2011 US Television ads \$3,120.00

11. For each year since Applicant first formed a bona fide intent to use Applicant's Mark, state the approximate annual dollar amount spent by Applicant promoting Applicant's Mark or the goods and/or services offered (or intended to be offered) by Applicant in connection with Applicant's Mark, providing a breakdown of such dollars by various promotional means, geographical area in which the goods and/or services were promoted, and nature of the goods and/or services promoted.

RESPONSE: See Response to Interrogatory 10.

12. State the date and circumstances under which Applicant first learned of Opposer's Mark or Opposer's use of Opposer's Mark.

RESPONSE: Applicant first learned of Opposer's Mark or Opposer's use of Opposer's Mark through this opposition.

13. With respect to the date and circumstances stated in Applicant's answer to Interrogatory No. 12, describe any investigation or research conducted by or on behalf of Applicant as a direct and proximate result of learning of Opposer's Mark, the inclusive dates of the investigation or research, the identity of the person(s) or entity(ies) who conducted the investigation or research, the substance of what Applicant learned as a result of the investigation or research, and what actions (if any) Applicant took as a direct and proximate result of learning of Applicant's Mark.

RESPONSE: None.

14. Identify each search or investigation conducted to assess the registrability of Applicant's Mark, or to assess whether use of Applicant's Mark might infringe upon the trademark rights of others, state the inclusive date(s) of each such search or investigation, identify the person(s) or entity(ies) who conducted the investigation or search, and state the results of the search or investigation.

RESPONSE: A trademark search was conducted by Jason Drangel of Epstein Drangel on January 7, 2009. The OUT mark was cleared for use and registration for the proposed goods.

15. If Applicant has objected in whole or in part to use or application for registration in the United States of a trademark or service mark by others, for each such instance identify:

- (a) The objecting person or entity, and the person or party using the objectionable mark;
- (b) The forum, if any, in which Applicant filed an objection, and the cancellation or opposition number, if any;
- (c) The mark or marks or words which were objected to;

- (d) The direct result of such objections; and
- (e) The identity of all documents which reference or concerns the objections or the resolution of the objections.

RESPONSE: Applicant has not objected to any other use that incorporates the term OUT for the same or similar goods/services as the goods identified in Applicant's OUT application.

16. If Applicant has ever entered into any co-existence agreement or settlement agreement relating to Applicant's Mark, state:

- (a) the identity of each party to the agreement;
- (b) The date of the agreement; and
- (c) the marks and the products or services that are the subject of the agreement.

RESPONSE: None.

17. State whether Applicant's Mark has been the subject of any question, suggestion or allegation of infringement, either informally or through an administrative proceeding or civil action, and if so, for each such claim identify:

- (a) The person or entity questioning, suggesting or alleging the infringement;
- (b) The mark upon which the person or entity based its question, suggestion or allegation of infringement;
- (c) The direct result of the question, suggestion or allegation of infringement; and
- (d) The identity of all documents which reference or concern the question, suggestion or allegation of infringement.

RESPONSE: None.

18. Identify all of Applicant's past and present trademark registrations or applications (federal or state) for Applicant's Mark or variations thereof.

RESPONSE: None.

19. State the geographical region in which Applicant intends to sell and market for sale goods and/or services in connection with Applicant's Mark.

RESPONSE: Presently, the U.S., Japan, and Italy. There are no other geographical regions of interest.

20. Identify any testifying expert employed by Applicant in connection with this proceeding and state the subject matter on which he/she is expected to testify, the substance of the facts and opinions to which each such expert is expected to testify, a summary of the grounds for each such opinion, and whether such expert has rendered any written report.

RESPONSE: None at present.

21. For each year since Applicant adopted Applicant's Mark, state the geographical region to which Applicant targeted the sales and marketing of its goods and services in connection with Applicant's Mark and the efforts made by Applicant to promote and sell its goods and services in the geographical region.

RESPONSE: The U.S., Italy and Japan.

22. Describe Applicant's current intentions with respect to expansion or contraction (geographically and/or in the scope of goods and services offered for sale) of its business conducted under Applicant's Mark.

RESPONSE: Ontel intends to continue sales of OUT in the U.S. via DRTV, online and potentially retail sales.

23. Identify all licensing, consent and distribution agreements involving use or contemplated use of Applicant's Mark.

RESPONSE: None.

24. Identify the trade associations and professional associations in which Applicant is a member and the inclusive dates of such memberships.

RESPONSE: Electronic Retailing Association (ERA), current member; and Direct Response Marketing Association (DRMA), current member.

25. As to each trade or professional show, meeting, convention, or other gathering in the United States at which Applicant has exhibited or promoted its products and/or services in connection with Applicant's Mark, identify the name of each such show, meeting or convention, where it was held and the dates when held.

RESPONSE: None.

26. State all facts supporting Applicant's denial of the allegations contained in Paragraph 5 of Opposer's *Notice of Opposition*.

RESPONSE: This is a contention interrogatory. The facts supporting this claim will be accumulated during the course of this action and presented at the end of discovery in a supplemental interrogatory response or at trial.

27. State all facts supporting Applicant's denial of the allegations contained in Paragraph 6 of Opposer's *Notice of Opposition*.

RESPONSE: This is a contention interrogatory. The facts supporting this claim will be accumulated during the course of this action and presented at the end of discovery in a supplemental interrogatory response or at trial.

28. State all facts supporting Applicant's denial of the allegations contained in Paragraph 7 of Opposer's *Notice of Opposition*.

RESPONSE: This is a contention interrogatory. The facts supporting this claim will be accumulated during the course of this action and presented at the end of discovery in a supplemental interrogatory response or at trial.

29. State all facts supporting Applicant's denial of the allegations contained in Paragraph 9 of Opposer's *Notice of Opposition*.

RESPONSE: This is a contention interrogatory. The facts supporting this claim will be accumulated during the course of this action and presented at the end of discovery in a supplemental interrogatory response or at trial.

30. State all facts supporting Applicant's denial of the allegations contained in Paragraph 13 of Opposer's *Notice of Opposition*.

RESPONSE: This is a contention interrogatory. The facts supporting this claim will be accumulated during the course of this action and presented at the end of discovery in a supplemental interrogatory response or at trial.

31. Identify all consumer surveys, studies or market research conducted by or on behalf of Applicant relating to Applicant's Mark or Opposer's Mark.

RESPONSE: None.

32. State by inclusive dates all periods of non-use of Applicant's Mark by Applicant since Applicant first adopted Applicant's Mark and the reason(s) for such non-use.

RESPONSE: Ontel has had continuous use of mark since 2009.

33. For each telephone call that Applicant and/or Applicant's counsel had with an examining attorney at the United States Patent and Trademark Office in connection with prosecuting Applicant's United States Trademark App. Ser. No. 77/648,190, including but not limited to any telephone call placed between the time Applicant's *Request for Reconsideration* was denied on May 27, 2010 and Applicant's Mark was approved for publication on June 1, 2010, state:

- (a) The date of the telephone call;
- (b) What the examining attorney said;
- (c) What Applicant and/or Applicant's counsel said;

- (d) The approximate duration of the telephone call;
- (e) The identities, addresses, telephone numbers and e-mail addresses of the persons participating in the telephone call;
- (f) The identity of the person(s) placing the call;
- (g) The purpose of the call; and
- (h) The actions, if any, taken by the examining attorney and/or Trademark Office in response to the telephone call.

RESPONSE: None.

34. Identify those persons who provided information for responding to these Interrogatories.

RESPONSE: Karen How, Jason Biziak, Mike Wade, all employees of Ontel Products Corp.

Verification

I affirm, under penalties for perjury, that the answers to the foregoing Interrogatories are true.

Date: 7/29/11

ONTEL PRODUCTS CORPORATION

By: 

Name: Ian R. Fried

Its: In-house counsel

AS TO OBJECTIONS:

EPSTEIN DRANGEL LLP
Attorneys for Applicant

Dated: 7/29/11
New York, New York

By: _____
Jason M. Drangel
60 East 42nd Street, Suite 2410
New York, New York 10165
Tel.: (212) 292-5390
Fax: (212) 292-5391

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Response to First Interrogatories to Applicant* was served on the following, via first class mail, postage prepaid, on this 29th day of July, 2011:

Gerard T. Gallagher
D. Michael Anderson
BARNES & THORNBURG LLP
600 1st Source Bank Center
100 N. Michigan Street
South Bend, IN 46601
Telephone: (574) 233-1171
Facsimile: (574) 237-1125
E-mail: jgallagher@btlaw.com

Attorney for Opposer

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

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
)
 v.)
)
Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 9

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

_____)	
IOIP HOLDINGS, LLC)	
)	
Opposer,)	
)	
v.)	
)	Trademark App. Ser. No. 77/648,190
)	Opposition No. 91197243
ONTEL PRODUCTS CORP.)	
)	
Applicant.)	
_____)	

**RESPONSE TO OPPOSER’S FIRST SET OF REQUESTS FOR
THE PRODUCTION OF DOCUMENTS AND THINGS TO APPLICANT**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Ontel Products Corp. (hereinafter “Ontel” or “Applicant”) hereby responds to Opposer, IOPIP HOLDINGS, LLC (hereinafter “Opposer”) First Set of Document Requests. To the extent not objected to below, and to the extent that Ontel can locate the documents by a reasonably diligent search, non-privileged, responsive documents will be produced.

General Objections

Ontel objects to Defendant’s requests to the extent that they seek the production of “each” or “all” documents or things where summary reports or representative documents or things would adequately respond to the requests.

Ontel objects to each request to the extent that it seeks documents beyond the scope permitted or required by the Federal Rules of Civil Procedure, or any other applicable rule or law.

In addition, Ontel objects to each request to the extent that it seeks documents protected

by the attorney-client privilege, the work product doctrine, or any other applicable privilege or evidentiary principle.

Nothing in Ontel's responses are intended as, or shall be deemed to be, a waiver of any attorney-client privilege, work-product doctrine, or other applicable privilege or evidentiary principle. If Ontel produces a privileged document, such production is to be deemed inadvertent and not a waiver of any applicable privilege or protection, and the inadvertently produced document will be subject to prompt return to Ontel by Opposer and its attorneys.

To the extent Opposer seeks documents containing confidential or proprietary business information of a third party, Ontel will not disclose any such documents absent the consent of the third party in question or an order of the Court.

By responding to these requests, Ontel does not intend to, nor shall they be deemed to have admitted or otherwise adopted the definitions set forth by Ontel in its requests.

Ontel have not completed its investigation of the facts relating to this case, discovery in this case, or preparation for trial. These responses are given without prejudice to Ontel's right to produce evidence of any subsequently discovered facts, including the right to supplement or modify these responses if it obtains further information. Ontel have made a diligent and good faith search for documents in its possession, custody, or control that are responsive to Opposer's requests.

However, Ontel cautions that, because of the overly broad nature of Opposer's requests, it is possible that Ontel currently may have in their possession, custody, or control responsive documents of which it is not presently aware or that it does not presently know are responsive. Accordingly, Ontel reserve the right to supplement their responses, including the objections contained herein, if and when such supplementation may be determined by Ontel to be

appropriate as a result of its continuing investigation of this matter.

Ontel reserve the right to produce at trial and make reference to any evidence, facts, documents, or information not discovered at this time, omitted through good faith error, mistake, or oversight, or the relevance of which have not presently been identified by Ontel.

Ontel also reserve the right to further modify these responses as a result of subsequently discovered information.

By making documents responsive to the requests available for inspection and copying, Ontel does not waive any objections as to competence, relevance, materiality, propriety, admissibility, and/or to any and all other objections on any ground that would require the exclusion from evidence of any document produced in accordance with Defendant's requests.

Subject to and without waiver of these General Objections, Ontel respond to the Document Requests as follows:

Requests and Responses

1. All documents identified in Applicant's answers to *Opposer's First Interrogatories to Applicant*.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

2. All non-privileged documents referencing or tending to evidence the earliest use and current use of Applicant's Mark with the goods identified in United States Trademark Application Ser. No. 77/648,190.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

3. All contractual agreements (e.g., licenses, consents, settlements) concerning use or contemplated use of Applicant's Mark by Applicant or others.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

4. All non-privileged documents reflecting, referencing or tending to evidence any communications between Applicant and others concerning this Opposition, the subject matter of this Opposition, and/or allegations made by Applicant or Opposer in this Opposition.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

5. Spreadsheets or statements sufficient to identify all information upon which the price, uses, sales volume and revenue figures given in response to Interrogatory No. 3 are based, the manner in which they were calculated, and to prove the accuracy of such price, uses, sales volume and revenue figures.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

6. Spreadsheets or statements sufficient to identify all information upon which the dollar amounts given in response to Interrogatory No. 10 are based, the manner in which they were calculated, and to prove the accuracy of the dollar amounts.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

7. Spreadsheets or statements sufficient to identify all information upon which the dollar amounts given in response to Interrogatory No. 11 are based, the manner in which they were calculated, and to prove the accuracy of the dollar amounts.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

8. All documents referencing or tending to evidence the circumstances of Applicant's development, creation, selection or adoption of Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

9. All documents referencing, concerning or tending to evidence each instance wherein any person has been confused, mistaken or deceived as to the identity of the parties to this proceeding or their respective products or services.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

10. Representative copies of all advertisements and other promotional or marketing materials prepared by, for, or on behalf of Applicant since Applicant first formed a bona fide intent to use Applicant's Mark, which bear or reflect Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

11. All documents that reference, concern or tend to evidence the use by any person, other than Opposer or Applicant, of the word "OUT," or any colorable imitation of such words as a brand or trade name in connection with the offering of goods or services.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

12. All documents referencing, concerning or tending to evidence any suggestion or allegations of infringement of Applicant's Mark made by or on behalf of Applicant.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

13. All documents referencing, concerning or tending to evidence any objections received by Applicant from any third party concerning Applicant's use, application for registration, or registration of Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

14. All documents referencing, concerning or tending to evidence surveys, market studies, focus groups, polls, research or analysis conducted by or on the behalf of Applicant related to Applicant's Mark or Opposer's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

15. All documents prepared, sent, received or filed in connection with Applicant's past and present trademark registrations and/or applications (federal or state) for Applicant's Mark, which specifically includes but is not limited to correspondence or notes and other documents or data prepared in connection with telephone calls by Applicant or Applicant's counsel with examining

attorneys at the United States Patent and Trademark Office in connection with Applicant's prosecution of United States Trademark Application Ser. No. 77/648,190.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

16. Representative brochures or other advertising or marketing materials showing use of Applicant's Mark from the date of first use to date.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

17. All documents reflecting, referencing, concerning or tending to evidence any press release, newspaper article or other publication which mentions Applicant (or any related company) and/or Applicant's Products/Services or Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

18. Summaries and tabulations of records identifying the publications and media in which Applicant (or any related company) has advertised or is advertising services or products using Applicant's Mark. If summaries or tabulations are unavailable, all records from which such information may be ascertained.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

19. All documents concerning Applicant's Mark that have been filed with or received from any governmental regulatory agency.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

20. All documents referencing, concerning or tending to evidence any civil, criminal or administrative action or proceeding involving Applicant's Mark or Applicant's Products/Services, including without limitation any proceeding before the United States Patent and Trademark Office or any state or federal court, or the national advertising division of the Counsel of Better Business Bureaus.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

21. Documents sufficient to prove each use of Applicant's Mark for different goods or services, and use of Applicant's Mark in different formats, since the date of first use of Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

22. All documents referencing, concerning or tending to evidence the meaning or significance to Applicant of the word "OUT" as its trademark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

23. For each year since Applicant first formed a bona fide intent to use Applicant's Mark, documents sufficient to identify the annual dollar volume of advertising spent by Applicant under or in connection with Applicant's Mark, including a breakdown of such advertising by various advertising media and geographical area of dissemination.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

24. All documents concerning, referencing or tending to evidence Applicant's current plans for expansion or contraction of its business (in terms of geography and/or in the scope of goods and services offered for sale) conducted under Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

25. All documents referencing or tending to evidence Applicant's promotional strategies and plans for Applicant's Products/Services.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

26. All searches or investigations, including all documents referencing or concerning any search or investigation, of any type conducted by or on behalf of Applicant in connection with its decision to adopt, use or apply for federal or state registration of Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

27. All searches or investigations of any type conducted by or on behalf of Applicant referencing or concerning Opposer's Marks.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

28. All documents referencing, concerning or tending to evidence any attempt by a third party to assert or enforce its trademark or service mark rights against Applicant's use, application for registration, and/or registration of Applicant's Mark, and any response(s) thereto.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

29. All documents reflecting, referencing or tending to evidence the facts stated in Applicant's answers to Interrogatory Nos. 27, 28, 29 and 30.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

30. All documents reflecting, referencing or tending to evidence the facts stated in Applicant's answers to Interrogatory No. 19.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

31. All documents concerning, referencing or tending to evidence Applicant's first knowledge of Opposer's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

32. The complete file and all reports (including all drafts) of any testifying expert employed or retained by Applicant in connection with this proceeding.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

33. All documents reflecting or referencing all inter partes proceedings and other litigations or disputes in which Applicant is or has been involved regarding Applicant's Mark, as well as any written challenges directed to or by Applicant concerning Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

34. All documents referencing, reflecting or tending to evidence the geographical scope of Applicant's historical and current use of Applicant's Mark since adoption of Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

35. Documents sufficient to identify the historical, current and future scope of geographical use claimed by Applicant under Applicant's Mark in this proceeding.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

36. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 5 of Opposer's *Notice of Opposition*.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

37. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 6 of Opposer's *Notice of Opposition*.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

38. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 7 of Opposer's *Notice of Opposition*.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

39. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 9 of Opposer's *Notice of Opposition*.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

40. All documents referencing, concerning, reflecting or tending to evidence the facts supporting Applicant's denial of the allegations contained in Paragraph 13 of Opposer's *Notice of Opposition*.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

41. Documents sufficient to identify the particular retailers, such as the "Retail Partners" reflected on Applicant's web page located at the URL: www.ontelproducts.com/retail, which currently offer any of Applicant's goods for sale.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

42. Documents sufficient to identify the particular retailers, such as the "Retail Partners" reflected on Applicant's web page located at the URL: www.ontelproducts.com/retail, which currently offer Applicant's "OUT" goods for sale.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

43. For each year that Applicant's "OUT" goods have been offered for sale by the particular retailer(s), documents sufficient to identify, by retailer and year, Applicant's total annual sales of Applicant's "OUT" goods to each retailer that currently offers and/or has historically offered Applicant's "OUT" goods for sale.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

44. Documents sufficient to identify the particular retailers, such as the "Retail Partners" reflected on Applicant's web page located at the URL: www.ontelproducts.com/retail, which have in the past offered any of Applicant's goods for sale.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

45. For each year that Applicant's "OUT" goods were offered for sale by the particular retailer(s), documents sufficient to identify, by retailer and year, Applicant's total annual sales of Applicant's "OUT" goods to each retailer that has in the past offered Applicant's "OUT" goods for sale.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

46. For each year that the particular retailer has/had offered Applicant's "OUT" goods for sale, documents sufficient to identify, by year and retailer, the total annual sales of Applicant's "OUT" goods by each retailer that currently or has in the past offered Applicant's "OUT" goods for sale.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

47. All documents referencing, reflecting or tending to evidence the trade channels and/or intended or contemplated trade channels for Applicant's "OUT" goods.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

48. All documents referencing, reflecting or tending to evidence the class, category, type or demographics of the consumers, targeted consumers, and/or intended consumers of Applicant's "OUT" goods.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

49. All documents referencing, reflecting or tending to evidence Applicant's historical and current retail and product-placement strategies for its "OUT" goods.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

50. For each year since Applicant first adopted Applicant's Mark, documents sufficient to identify and prove the annual gross revenue realized by Applicant for sales of Applicant's Products/Services offered in connection with Applicant's Mark.

RESPONSE: Subject to the General Objections above, and to the extent such documents exist, are relevant to this U.S. action and are within Applicant's possession, custody or control, such documents will be produced.

EPSTEIN DRANGEL LLP

Attorneys for Applicant

Dated: 7/29/11
New York, New York

By: _____
Jason M. Drangel
60 East 42nd Street, Suite 2410
New York, New York 10165
Tel.: (212) 292-5390
Fax: (212) 292-5391

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Response to First Request for Production of Documents to Applicant* was served on the following, via first class mail, postage prepaid, on this

29th day of July, 2011:

Gerard T. Gallagher
D. Michael Anderson
BARNES & THORNBURG LLP
600 1st Source Bank Center
100 N. Michigan Street
South Bend, IN 46601
Telephone: (574) 233-1171
Facsimile: (574) 237-1125
E-mail: jgallagher@btlaw.com

Attorneys for Opposer

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

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
)
 v.)
)
Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 10

Instant Stain Remover!

OUT!

Before

AS SEEN ON TV

Gets Stains
OUT!

After



Safe For Colors



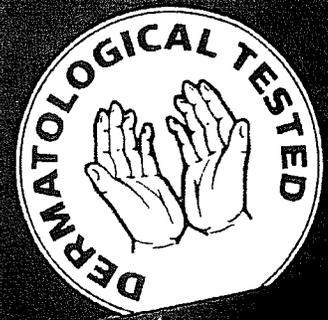
Pet Stains



Grass Stains

Works On:

- Clothing
- Carpets
- Upholstery
- Car Seats
- Leather
- And more!



Ontel
PRODUCTS CORPORATION

21 Law Drive, Fairfield, NJ 07004

East Coast: Tel: (973) 439-9000 Fax: (973) 439-9024
West Coast: Tel: (760) 471-5054 Fax: (760) 471-5036

For Ordering Call: 1-800-245-0511 Toll Free
Check out our website at www.OntelProducts.com

ONT0001

1



ONT0004

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

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
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)
Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 11



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Find the solution to all of your household cleaning needs in 2 easy steps.

OUR BRANDS TACKLE TOUGH CLEANING PROBLEMS LIKE NO OTHER BRAND CAN

From rust and stain removal, to clog removal, to drain and septic care, to water treatment, Summit Brands has the product for achieving optimum results for many of your home cleaning needs. And our consumers know this very well.

[Click here to read some great testimonials.](#)

Select a product below to learn more about it, to find cleaning tips and directions as well as where you can buy it.

- [Rust Removal Solutions](#)
- [Super Iron Out](#)
- [Super Iron Out Automatic Toilet Bowl Cleaner](#)
- [White Brite](#)
- [Lime Out Extra](#)
- [Super Iron Out Spray](#)
- [Outdoor](#)

- [Laundry Cleaning Solutions](#)
- [White Brite](#)
- [Washer Magic](#)
- [Super Iron Out Spray](#)
- [Super Iron Out](#)

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- [Dishwasher Magic](#)
- [Disposer Care](#)
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- [Drain Out Crystal](#)
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- [Drain Out Enzyme Septic System Treatment](#)
- [Drain Out Enzyme Build Up Remover](#)

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- [Potassium Permanganate](#)

- [Softener Cleaner](#)
- [Liquid Softener Cleaner](#)
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Find the solution to all of your household cleaning needs in 2 easy steps.

SUPER IRON OUT



- #1 Brand of Multi-Purpose Rust Stain Remover
- Superior Solution to Any Rust Stain
- Cleans Toilets, White Laundry, Water Softeners and More...
- Rinses Rust Away Without Scrubbing
- Does Not Contain Harsh or Abrasive Chemicals

Product Information

Since 1958 SUPER IRON OUT has been the number one brand because it works better on rust stains than any other product. SUPER IRON OUT cleans toilet bowls, toilet tanks, white clothing, sinks, tubs, tile and showers, appliances -washers and dishwashers, water softeners, concrete and exterior walls. SUPER IRON OUT chemically changes rust and iron into a clear, soluble state that easily rinses away without scrubbing. It does not contain harsh or abrasive chemicals and is safe for white clothes, fiberglass, porcelain, and acrylic finishes.

It is recommended by water softener manufacturers to use SUPER IRON OUT as preventative maintenance and to eliminate iron build-up if water softener is on hard water.

AVAILABLE SIZES: 18 oz., 30 oz., 5 lb., 10 lb.

BEFORE | AFTER

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FAQS

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Cleaning Tips

(Please follow cautions and instruction on the label carefully.)

WATER SOFTENER

All softeners on hard water require SUPER IRON OUT regularly as preventative maintenance. Iron builds up in the mineral bed of a water softener which leads to reduced capacity. SUPER IRON OUT dissolves the iron and is rinsed from the softener much the same as salt brine.

FIRST APPLICATION TO WATER SOFTENER

Dissolve 1 cup of SUPER IRON OUT in ½ gallon cold water. Pour directly into brine well or salt tank when salt level is low. Manually regenerate softener. Repeat for heavily fouled units.

REGULAR USE IN WATER SOFTENER

Add ¼ cup of SUPER IRON OUT per 40lbs. of salt. Layer for continuous treatment. In cabinet models use for periodic cleaning only and follow first application instruction only. If taste or odor is detected in tap water, manually regenerate softener, then run cold water until odor is gone.

TOILET BOWLS

Remove any cleaners or deodorant from bowl. Flush clear. Add ½ cup of SUPER IRON OUT to water in bowl. Scrub stained area with brush. Let stand until stains are dissolved. Flush clear.

TOILET TANKS

Remove any cleaners or deodorant from tank. Flush clear. Raise water level above stain line if possible. Add ½ cup of SUPER IRON OUT. Let stand overnight or until stains are gone. Repeat if needed.

WHITE LAUNDRY & COLORFAST FABRICS

Add ½ cup of SUPER IRON OUT to washer as it is filling with warm water. Add clothes and let soak for 5 minutes, if possible, by stopping the machine. Add detergent and resume washing cycle. Dry as usual. Test all colors before using. For use only on colorfast fabrics. Not for use with bleach or peroxides. May cause damage to colors and embroidered logos.

TUBS, SINKS, TILE, ETC.

Wet area to be cleaned. Apply SUPER IRON OUT to damp sponge or cloth. Rub lightly until stains are gone then Rinse. NOTE: Not recommended for older, worn or chipped porcelain cast iron fixtures.

DISHWASHER/ WASHING MACHINE

Add ½ cup of SUPER IRON OUT to EMPTY machine. Run machine through normal cycle using water only. Repeat as needed. Note: Do not open machine mid-cycle.

DISHES, GLASS, PLASTIC WARE

Dissolve ½ cup of SUPER IRON OUT in 1 gallon of warm water. Soak items for 5 minutes, or until stains are gone. Rinse thoroughly. Repeat as needed.

EXTERIOR SURFACES

(Stone, Concrete, Brick, Boats, RVs) Mix 1 cup of SUPER IRON OUT into 1 gallon warm water. Wet surface with regular water. Apply with brush or sponge. Keep saturated until stains are gone then Rinse. NOTE: Avoid contact with vegetation.

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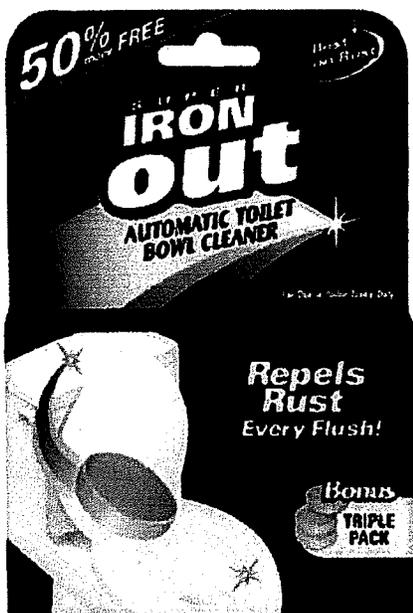
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Find the solution to all of your household cleaning needs in 2 easy steps.

Iron Out Automatic Toilet Bowl Cleaner



- Repels Rust & Hard Water Stains with Every Flush
- Long Lasting Formula Works to Prevent Rust Stains from Forming up to 30 Days
- Safe for Plumbing & Septic Tanks

BUY ONLINE

Product Information

SUPER IRON OUT AUTOMATIC TOILET BOWL CLEANER (ATBC) is designed & tested to repel rust & hard water stains with every flush of your toilet bowl. The concentrated formula cleans rust away and repels new stains from forming for at least 30 days per tablet.

SUPER IRON OUT AUTOMATIC TOILET BOWL CLEANER (ATBC) is easy to use. Simply drop in a tablet and let SUPER IRON OUT ATBC do the work for you. For even better results use SUPER IRON OUT Multi-Purpose Powder or Liquid rust stain remover to clean the bowl first!

SUPER IRON OUT AUTOMATIC TOILET BOWL CLEANER (ATBC) is laboratory tested and is safe for septic systems and your toilet parts.

AVAILABLE SIZE: 2.1 oz, 6.3 oz.



Cleaning Tips

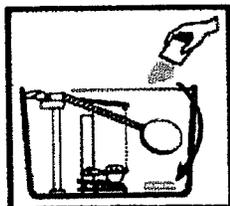
(Please follow cautions and instructions on the label carefully.)

For best results clean toilet bowl with SUPER IRON OUT Multi-Purpose Powder or Liquid Rust Stain Remover first.

Remove toilet tank cover. Cut open plastic pouch containing SUPER IRON OUT ATBC. Flush toilet clear. Before tank refills, hold plastic pouch containing SUPER IRON OUT ATBC over tank and drop 1 tablet of SUPER IRON OUT ATBC into the right rear corner of the tank (see diagram). Replace toilet tank cover. Discard pouch and wash hands after handling. **IMPORTANT:** Wait 10 minutes before flushing again.

Use new tablet of SUPER IRON OUT ATBC after 30 days or when stains reappear. **NOTE:** For use in toilet tanks only. Bowl water not harmful to children or pets. However, it is not recommended that pets regularly drink water from the toilet.

For all other rust stains (Laundry, Water Softeners, Tubs, Sinks, etc.) use SUPER IRON OUT Multi-Purpose Powder or Liquid Rust Stain Remover.



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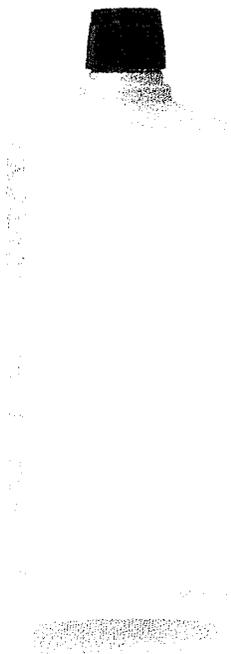


Find the solution to all of your household cleaning needs in 2 easy steps.

LIME OUT EXTRA

- Quickly Dissolves the Toughest Lime, Rust, Calcium & Mineral Deposits.

- Ready to Use Liquid Works Great on Vertical Surfaces.
- Heavy Duty Thick Formula Clings Longer for Maximum Cleaning Power.
- For Use on Bath, Showers, Sinks, Cookware, Boats, Cars, Exterior Surfaces & Appliances.



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Product Information

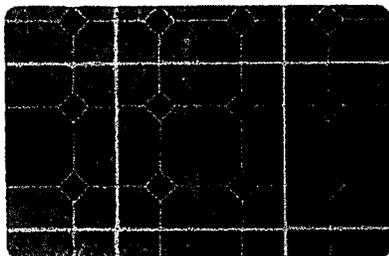
LIME OUT EXTRA is a heavy duty liquid that is specially formulated to quickly dissolve the toughest lime, rust and calcium deposits.

Use LIME OUT EXTRA in the bath, kitchen or laundry area.

It leaves toilets, sinks, tubes, tile, showers, chrome, fiberglass, stainless steel, pots, pans and tea kettles fresh and clean without scrubbing.

A special thickener has been added to LIME OUT EXTRA to help it cling to vertical surfaces.

AVAILABLE SIZE: 24 fl. oz.



BEFORE | AFTER

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Cleaning Tips

(Please follow cautions and instructions on the label carefully.)

TOILET BOWL

Squirt LIME OUT EXTRA generously on stains and let soak. Brush and flush clean. Rinse brush. Repeat if needed.

TUB, SINK, TILE, SHOWER DOORS, FAUCETS

Mix LIME OUT EXTRA with an equal amount of water. Use full strength on tough stains. Apply with damp sponge or cloth. Rinse promptly and thoroughly. Foaming may occur as lime scale is dissolving.

DISHWASHER/WASHING MACHINES

Apply LIME OUT EXTRA to interior of machine with sponge or cloth. Run empty machine through a rinse cycle. Repeat for heavily stained machines.

OTHER USES

Cookware, Tea Kettles, Humidifiers, Fiberglass Boats. Follow same directions as Tub, Sink, Tile, etc.

NOTE: Depending on the quality of material, this product may etch or discolor some stainless steel, chrome, brass, or aluminum fixtures. Do not use on natural marble, stone, terrazzo, plastic laminates or colored grout. This product is not recommended for older, worn or chipped porcelain fixtures, glass or ceramic tile. Test a hidden area before using and/or use half strength to avoid potential damage. As with most cleaners, allow only enough contact time as necessary to do the job. Rinse promptly and thoroughly when done.

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Find the solution to all of your household cleaning needs in 2 easy steps.

SUPER IRON OUT SPRAY



- Quickly & Easily Removes the Toughest Rust Stains from Most Surfaces In & Around the Home
- Ready to Use Multi-Purpose Liquid Comes In An Easy to Use Trigger Spray
- Great for Cleaning Bath, Shower, Toilets, Colorfast Fabrics, Vertical Surfaces and Hard to Reach Places
- Non Abrasive, Non Hydrofluoric Acid Based Formula is Safer Than Other Liquid Rust Stain Removers

Product Information

SUPER IRON OUT is specially formulated non-abrasive rust stain remover that cleans bath & shower, toilets, colorfast fabrics and more. The convenient trigger spray bottle makes it easy to use on vertical surfaces and in hard to reach places. Advanced formula SUPER IRON OUT Spray is effective, yet much safer than traditional liquid rust stain removers due to its non-hydrofluoric acid design.

AVAILABLE SIZES: 16 fl. oz. & 24 fl. oz. Trigger Spray

Cleaning Tips

(Please follow cautions and instructions on the label carefully.)

HARD TO REACH PLACES

Apply directly to stained area. Let stand for a few seconds. Wipe with damp sponge or cloth if needed. Rinse promptly and thoroughly. Repeat for tougher stains.

VERTICLE SURFACES

Start at the bottom and work your way up.

COLORFAST FABRICS

before using test an inconspicuous area for suitability and colorfastness. Dampen stain with water, apply SUPER IRON OUT Spray, allow penetrating. Rinse with cool water and launder as usual.

GENERAL INFORMATION:

Wear gloves when using this product. Not for use in water treatment equipment. Wipe up spills immediately. SUPER IRON OUT Spray is safe for white & colored toilet bowls and on all plumbing. Product may damage natural marble, terrazzo, or brick and stone with iron oxide pigments. Avoid contact with wood, painted surfaces and wallpaper. To avoid damage, leave cleaner on only as long as necessary.

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Find the solution to all of your household cleaning needs in 2 easy steps.

SUPER IRON OUT SPRAY



- Quickly & Easily Removes the Toughest Rust Stains from Most Surfaces In & Around the Home
- Ready to Use Multi-Purpose Liquid Comes In An Easy to Use Trigger Spray
- Great for Cleaning Bath, Shower, Toilets, Colorfast Fabrics, Vertical Surfaces and Hard to Reach Places
- Non Abrasive, Non Hydrofluoric Acid Based Formula is Safer Than Other Liquid Rust Stain Removers

Product Information

SUPER IRON OUT is specially formulated non-abrasive rust stain remover that cleans bath & shower, toilets, colorfast fabrics and more. The convenient trigger spray bottle makes it easy to use on vertical surfaces and in hard to reach places. Advanced formula SUPER IRON OUT Spray is effective, yet much safer than traditional liquid rust stain removers due to its non-hydrofluoric acid design.

AVAILABLE SIZES: 16 fl. oz. & 24 fl. oz. Trigger Spray

Cleaning Tips

(Please follow cautions and instructions on the label carefully.)

HARD TO REACH PLACES

Apply directly to stained area. Let stand for a few seconds. Wipe with damp sponge or cloth if needed. Rinse promptly and thoroughly. Repeat for tougher stains.

VERTICLE SURFACES

Start at the bottom and work your way up.

COLORFAST FABRICS

before using test an inconspicuous area for suitability and colorfastness. Dampen stain with water, apply SUPER IRON OUT Spray, allow penetrating. Rinse with cool water and launder as usual.

GENERAL INFORMATION:

Wear gloves when using this product. Not for use in water treatment equipment. Wipe up spills immediately. SUPER IRON OUT Spray is safe for white & colored toilet bowls and on all plumbing. Product may damage natural marble, terrazzo, or brick and stone with iron oxide pigments. Avoid contact with wood, painted surfaces and wallpaper. To avoid damage, leave cleaner on only as long as necessary.

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SUPER IRON OUT



- #1 Brand of Multi-Purpose Rust Stain Remover
- Superior Solution to Any Rust Stain
- Cleans Toilets, White Laundry, Water Softeners and More...
- Rinses Rust Away Without Scrubbing
- Does Not Contain Harsh or Abrasive Chemicals

Product Information

Since 1958 SUPER IRON OUT has been the number one brand because it works better on rust stains than any other product. SUPER IRON OUT cleans toilet bowls, toilet tanks, white clothing, sinks, tubs, tile and showers, appliances -washers and dishwashers, water softeners, concrete and exterior walls. SUPER IRON OUT chemically changes rust and iron into a clear, soluble state that easily rinses away without scrubbing. It does not contain harsh or abrasive chemicals and is safe for white clothes, fiberglass, porcelain, and acrylic finishes.

It is recommended by water softener manufacturers to use SUPER IRON OUT as preventative maintenance and to eliminate iron build-up if water softener is on hard water.

AVAILABLE SIZES: 18 oz., 30 oz., 5 lb., 10 lb.

BEFORE | AFTER

BUY ONLINE

FAQS

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Cleaning Tips

(Please follow cautions and instruction on the label carefully.)

WATER SOFTENER

All softeners on hard water require SUPER IRON OUT regularly as preventative maintenance. Iron builds up in the mineral bed of a water softener which leads to reduced capacity. SUPER IRON OUT dissolves the iron and is rinsed from the softener much the same as salt brine.

FIRST APPLICATION TO WATER SOFTENER

Dissolve 1 cup of SUPER IRON OUT in ½ gallon cold water. Pour directly into brine well or salt tank when salt level is low. Manually regenerate softener. Repeat for heavily fouled units.

REGULAR USE IN WATER SOFTENER

Add ¼ cup of SUPER IRON OUT per 40lbs. of salt. Layer for continuous treatment. In cabinet models use for periodic cleaning only and follow first application instruction only. If taste or odor is detected in tap water, manually regenerate softener, then run cold water until odor is gone.

TOILET BOWLS

Remove any cleaners or deodorant from bowl. Flush clear. Add ½ cup of SUPER IRON OUT to water in bowl. Scrub stained area with brush. Let stand until stains are dissolved. Flush clear.

TOILET TANKS

Remove any cleaners or deodorant from tank. Flush clear. Raise water level above stain line if possible. Add ½ cup of SUPER IRON OUT. Let stand overnight or until stains are gone. Repeat if needed.

WHITE LAUNDRY & COLORFAST FABRICS

Add ½ cup of SUPER IRON OUT to washer as it is filling with warm water. Add clothes and let soak for 5 minutes, if possible, by stopping the machine. Add detergent and resume washing cycle. Dry as usual. Test all colors before using. For use only on colorfast fabrics. Not for use with bleach or peroxides. May cause damage to colors and embroidered logos.

TUBS, SINKS, TILE, ETC.

Wet area to be cleaned. Apply SUPER IRON OUT to damp sponge or cloth. Rub lightly until stains are gone then Rinse. NOTE: Not recommended for older, worn or chipped porcelain cast iron fixtures.

DISHWASHER/ WASHING MACHINE

Add ½ cup of SUPER IRON OUT to EMPTY machine. Run machine through normal cycle using water only. Repeat as needed. Note: Do not open machine mid-cycle.

DISHES, GLASS, PLASTIC WARE

Dissolve ½ cup of SUPER IRON OUT in 1 gallon of warm water. Soak items for 5 minutes, or until stains are gone. Rinse thoroughly. Repeat as needed.

EXTERIOR SURFACES

(Stone, Concrete, Brick, Boats, RVs) Mix 1 cup of SUPER IRON OUT into 1 gallon warm water. Wet surface with regular water. Apply with brush or sponge. Keep saturated until stains are gone then Rinse. NOTE: Avoid contact with vegetation.

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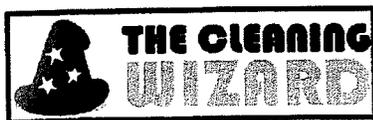
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Find the solution to all of your household cleaning needs in 2 easy steps.

WHIRLOUT

- Cleans Hot Tubs, Spas, Whirlpools & Jetted Bathtubs.

- Removes Body Oils, Soap Scum and Dirt from Pumps, Pipes and Surfaces
- Fast & Easy Self Cleaning Action



BUY ONLINE

Product Information

WHIRLOUT's fast & easy self-cleaning action safely removes soap scum & build-up, odors, bath & body oils, dirt and other system residue from inside of all pipes, pumps, fittings and the circulation system. Leaves acrylic, fiberglass, and enamel and chrome surfaces fresh and clean without scrubbing. Regular use helps prevent buildup.

AVAILABLE SIZES: 1.5 lb.

FAQS

Follow the directions below after each use or after a period of inactivity. **DO NOT USE WHILE BATHING.** If unit has adjustable air/volume control, adjust to medium. Water level should be at least 2 inches above suction intake and highest jet. Note: WHIRLOUT is most effective when used with warm water.

WHIRLPOOL/JETTED BATHTUB

1. After using tub and prior to draining, activate circulation pump
2. Add 1/2 the container of WhirlOut near the suction intake.
3. Allow WhirlOut to circulate for 3-4 minutes.
4. Drain tub and refill, and then circulate for 1 minute to rinse.

5. Drain tub. Repeat as needed.

HOT TUB/SPAS:

Use prior to draining unit only. Follow JETTED BATHTUB instructions, however, use the entire container of WHIRLOUT and increase circulation time to 10 minutes.

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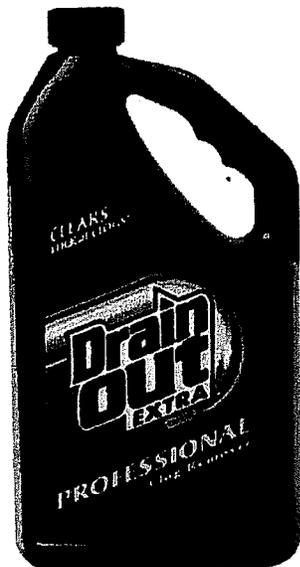


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DRAIN OUT EXTRA

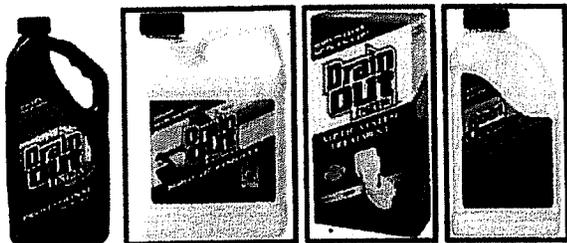
- TOUGH CLOGS DON'T STAND A CHANCE

- Professional Strength Formula
- Twice as Strong as Regular Clog Removers
- Starts Working Instantly On Hair, Grease & Other Common Blockages
- Safe for All Pipes, Septic Systems and Garbage Disposers



Additional Drain Out Products

To view the additional Drain Out product line, click on the products below.



Product Information

DRAIN OUT EXTRA'S professional strength liquid formula contains twice the active ingredients of most clog removers. DRAIN OUT EXTRA liquefies fats, grease, oil, hair, and other organic matter. Cleans and deodorizes drains.

What Makes DRAIN OUT EXTRA Stronger?

DRAIN OUT EXTRA uses Potassium Hydroxide to attack fats, grease, oil, hair and other organic material.

AVAILABLE SIZES: 32 fl. oz., 64 fl. oz.

BEFORE & AFTER - SEE THE DIFFERENCE

BUY ONLINE

FAQS

Cleaning Tips

(Please follow cautions and instructions on the label carefully.)

Use DRAIN OUT EXTRA regularly to eliminate buildup, slow drains, and clogs and drain odors

STANDARD DRAINS

Pour 16 oz. of DRAIN OUT EXTRA slowly into drain. Allow to work for 15 minutes. If drain does not clear, allow 30 minutes. Flush with hot water. Repeat if necessary.

LARGER DRAINS (FLOOR OR GARAGE)

Double amount of DRAIN OUT EXTRA used.

GARBAGE DISPOSER DRAINS

Follow same directions. If drain has not opened, do not turn on disposer since DRAIN OUT EXTRA may splash back. Consult plumber. Do not use in clogged toilets or dishwashers.

TO KEEP DRAINS RUNNING FREE AND TO ELIMINATE ODORS

Follow directions above using ¼ bottle of DRAIN OUT EXTRA weekly as directed.

IMPORTANT:

Open carefully. Do not squeeze bottle. Avoid splashing. Clean up spills immediately. Keep hands, face and children away from drains while using. Never use a plunger during or after use or take trap or pipes apart because chemicals may still be present if drain did not clear. Consult plumber.

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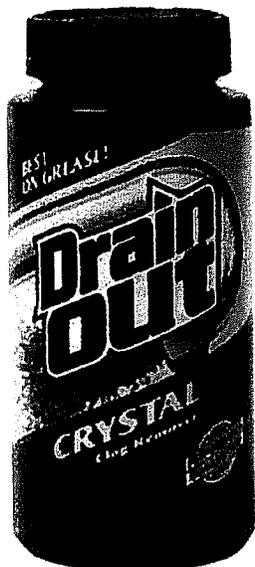


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DRAIN OUT CRYSTAL

- TOUGH CLOGS DON'T STAND A CHANCE

- Commercial Grade Drain Opener
- Starts to Work On Contact
- Stronger & Faster Than Liquid Clog Removers
- Powerful Churning Action Powers Through the Toughest Grease, Hair & Sludge



Additional Drain Out Products

To view the additional Drain Out product line, click on the products below.



BUY ONLINE

Product Information

DRAIN OUT CRYSTAL is a commercial grade drain opener with powerful churning action that eats through the toughest organic obstructions in sewers, grease traps and drains. Ideal for hair and sludge.

DRAIN OUT CRYSTAL will not harm metal or plastic pipes, sewers or septic systems.

DRAIN OUT CRYSTAL is an ideal substitute for sulfuric acid.

DRAIN OUT CRYSTAL uses Caustic Soda with Aluminum Chips. Mixing Caustic Soda with Aluminum Chips produces heat and bubbles that act as a scrubbing agent in clogged pipes.

AVAILABLE SIZES: 1 lb. 2 oz.



Cleaning Tips

(Please follow cautions and instructions on the label carefully.)

Remove standing water. Make sure water in drain is cool. Remove drain strainer if possible. Pour 2 Tablespoons of DRAIN OUT CRYSTAL into drain pipe. Securely close lid on bottle. In case of spills, sweep into dust pan, empty down nearest drain and pour COOL water down the drain. Immediately add one cup of COOL water to drain (if water boils out of drain, add another cup of COOL water). Rinse spoon immediately after use. After 15 minutes run COOL water down drain. If drain is still clogged, repeat.

DO NOT REPEAT AFTER SECOND APPLICATION. CONSULT PLUMBER.

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DRAIN OUT ENZYME SEPTIC SYSTEM TREATMENT

- TOUGH CLOGS DON'T STAND A CHANCE
- Concentrated 100% Natural Bio-Enzymatic Active Ingredients
- Dissolves Grease, Fats, Paper, Starches & Protein
- Maximizes Time Between Required Pumping
- Helps Prevent Drain Field Failure Which Equal Costly Repairs & Excavation



Additional Drain Out Products

To view the additional Drain Out product line, click on the products below.



[BUY ONLINE](#)

Product Information

DRAIN OUT ENZYME products are a complete family of drain and septic maintenance products. Scientifically formulated, the bacteria and enzymes contain no acid or caustics and are safe for all plumbing systems. Major uses for the products include the breakdown of organic matter in septic tanks, household and commercial drains, RV holding tanks, composting, and the cleaning and deodorizing of garbage disposals. Our concentrated blend of natural bacteria and enzymes make the DRAIN OUT ENZYME products a leader in organic breakdown technology.

DRAIN OUT ENZYME SEPTIC SYSTEM TREATMENT's natural enzymes break down sewage and solid organic waste matter grease, fat, protein, starch and paper without using harsh chemicals that destroy the natural bacteria your septic system needs to work properly.

AVAILABLE SIZES: 24 oz.



Cleaning Tips

(Please follow cautions and instructions on the label carefully.)

USE ONE BOX EACH MONTH TO HELP PREVENT SEPTIC BACKUP!

DRAIN OUT ENZYME SEPTIC SYSTEM TREATMENT is not designed to remove clogs. For clogged drains, use DRAIN OUT EXTRA or DRAIN OUT CRYSTAL Clog Removers, depending on the extent of the problem. See individual product labels.

BASIC SEPTIC/CESSPOOL HEALTH

Septic systems and cesspools depend on enzyme-producing bacteria to break down solid wastes. In a healthy system, laundry detergents, grease and other normal household waste are reduced, liquefied and dispersed.

Problems occur when the bacteria and enzyme levels fall below the levels necessary to digest the incoming waste. When this biological action slows or stops, problems such as clogged pipes, odors and system backup can occur, requiring expensive repairs.

DRAIN OUT ENZYME SEPTIC SYSTEM TREATMENT helps restart out of balance systems and assists in the maintenance of correct enzyme levels for the best septic performance.

DIRECTIONS FOR USE (UP TO 1,500 GALLON SYSTEMS): SEPTIC TANKS/LATERAL LINES/CESSPOOLS

Pour entire box of DRAIN OUT ENZYME SEPTIC SYSTEM TREATMENT into toilet and flush. Several flushes may be necessary to clear enzyme mix from bowl. Repeat monthly.

Contains bacteria cultures, enzymes, micronutrients and inert ingredients. Safe for pipes. Occasional pumping of the septic tank/cesspool may be required as part of normal maintenance to keep the system working properly.

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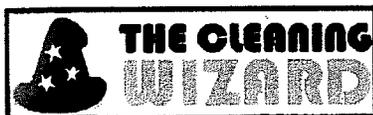
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DRAIN OUT ENZYME BUILD UP REMOVER

- TOUGH CLOGS DON'T STAND A CHANCE

- Concentrated Liquid Breaks Down Organic Build-Up on the Inside of Drain Pipes & Sewer Lines
- Continues to Work Weeks after Treatment
- Helps Restore Flow & Eliminates Odors
- Formulated with Several Types of Enzymes



Additional Drain Out Products

To view the additional Drain Out product line, click on the products below.



[BUY ONLINE](#)

Product Information

DRAIN OUT ENZYME products are a complete family of drain and septic maintenance products. Scientifically formulated, the bacteria and enzymes contain no acid or caustics and are safe for all plumbing systems. Major uses for the products include the breakdown of organic matter in septic tanks, household and commercial drains, RV holding tanks, composting, and the cleaning and deodorizing of garbage disposals. Our concentrated blend of natural bacteria and enzymes make the DRAIN OUT ENZYME products a leader in organic breakdown technology.

DRAIN OUT ENZYME BUILD-UP REMOVER ends slow-running drains caused by organic build-up. Over time, soaps, fats, grease and other organic materials build up and coat the inside of pipes and cause slow drains and clogs. Most drain cleaners remove the clog, but the build-up or coating inside the pipes may still remain.

AVAILABLE SIZES: 32 fl. oz.



Cleaning Tips

(Please follow cautions and instructions on the label carefully.)

1. Contains both aerobic and anaerobic bacteria
2. Regular use reduces maintenance costs
3. Safe for all pipes, garbage disposers, plumbing and septic systems
4. Contains no acid or caustics

FIRST-TIME TREATMENT FOR SLOW RUNNING DRAINS AND ODOR ELIMINATION

Shake well. Pour ½ bottle or 18 oz. of **DRAIN OUT ENZYME BUILD-UP REMOVER** down each drain needing treatment. Do not run water into treated drain for 6-8 hours. Repeat treatment each week until clear. **NOTE:** Drain Out Build-Up Remover is not designed to remove clogs. For extremely slow drains, use **DRAIN OUT EXTRA Professional Clog Remover** 24 hours before treating with **DRAIN OUT ENZYME BUILD-UP REMOVER**.

KEEPING DRAINS CLEAR

Pour ¼ cup of **DRAIN OUT ENZYME BUILD-UP REMOVER** down each drain weekly.

SEPTIC SYSTEMS

Shake well. Pour entire bottle of **DRAIN OUT ENZYME BUILD-UP REMOVER** down drain nearest septic tank. Treat monthly.

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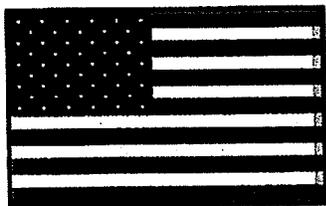
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HOW CAN WE HELP YOU?

- Retail Store



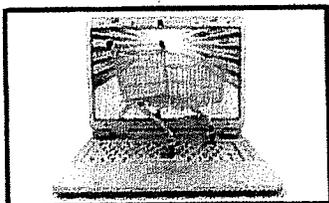
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Locator: Canada

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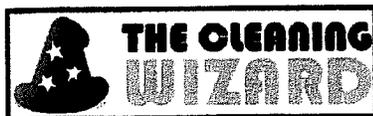
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Dishwasher Magic



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Disposer Care



Where to Buy

Drain Out Enzyme



Build-up Remover

Where to Buy

Drain Out Crystal



Where to Buy

Drain Out Enzyme



Septic System Treatment

Where to Buy

Drain Out Extra



Where to Buy



Glisten

Where to Buy



**Super Iron Out
Spray**



Where to Buy



**Super Iron Out Automatic
Toilet Bowl Cleaner**

Where to Buy



Lime Out



Where to Buy



Plink

plink



Where to Buy



Root Clear



Where to Buy



Super Iron Out



Where to Buy



Washer Magic



Where to Buy



Whirl Out



White Brite (Formerly Yellow Out)

Where to Buy





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Dishwasher Magic



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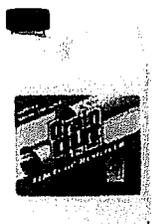
Disposer Care



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Drain Out Enzyme



Build-up Remover

Where to Buy



Drain Out Crystal



Where to Buy



Drain Out Enzyme



Septic System Treatment

Where to Buy



Drain Out Extra



Where to Buy



Glisten

Where to Buy



**Super Iron Out
Spray**



Where to Buy



**Super Iron Out Automatic
Toilet Bowl Cleaner**

Where to Buy



Lime Out



Where to Buy



Plink

plink



Where to Buy



Root Clear



Where to Buy



Super Iron Out



Where to Buy



Washer Magic



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Whirl Out



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- [OUR BRANDS](#)
- [OUR COMPANY](#)
- [IN THE NEWS](#)
- [FAQS](#)
- [WHERE TO BUY](#)
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 Like 31

SEARCH

- [Retail Store Locator: USA](#)
- [Retail Store Locator: Canada](#)
- [Buying Online](#)

EXPLORE OUR BRANDS!



BE THE FIRST TO KNOW

Sign-up for email announcements on new products and promotions.

Enter Email Address

SUBMIT

THE CLEANING WIZARD



Find the solution to all of your household cleaning needs in 2 easy steps.

WHERE TO BUY IN THE UNITED STATES

Visit these retailers to buy in-store: *Not all products are available at every retail outlet. Please check with the store closest to you for availability.

Dishwasher Magic



Where to Buy

Disposer Care



Where to Buy

Drain Out Enzyme



Build-up Remover

Spartan Stores

Drain Out Crystal



Where to Buy

Drain Out Enzyme



Septic System Treatment

Where to Buy

Drain Out Extra



Where to Buy

Glisten

Where to Buy

**Super Iron Out
Spray**



Where to Buy

**Super Iron Out Automatic
Toilet Bowl Cleaner**

Where to Buy

Lime Out



Menards

Plink

plink



Where to Buy

Root Clear



Where to Buy

Super Iron Out



Sam's Club

Washer Magic



Where to Buy

Whirl Out



White Brite (Formerly Yellow Out)

Do It Best Corp



EXPLORE OUR BRANDS!



Buy Now at the SUMMIT STORE

SHOP NOW

BE THE FIRST TO KNOW
Sign up for our newsletter to receive
news, product and promotion
information.

Enter Email Address

SUBMIT

THE CLEANING
Find the solution to all of your
household cleaning needs in 2011

WHERE TO PURCHASE SUMMIT BRANDS / USA

Visit these retailers to buy in-store. *Not all products are available at every retail outlet. Please check with the store closest to you for availability.

Best Store Locator USA | Retail Store Locator Canada | Export Orders

OUR BRANDS | OUR COMPANY | IN THE NEWS | FAQs | WHERE TO BUY | CONTACT US



Dishwasher Magic
Where to Buy



Disposer Care
Where to Buy



Drain Out Enzyme
Build-up Remover
Where to Buy



Drain Out Crystal
Where to Buy



Blatta Farm & Fleet
Do It Best Corp.
Frod Meyer
Meijer
Menard's
Orschelins
Spartan Stores
Super Valu
Where to Buy



Drain Out Extra
Where to Buy

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

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
)
 v.)
)
Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 12



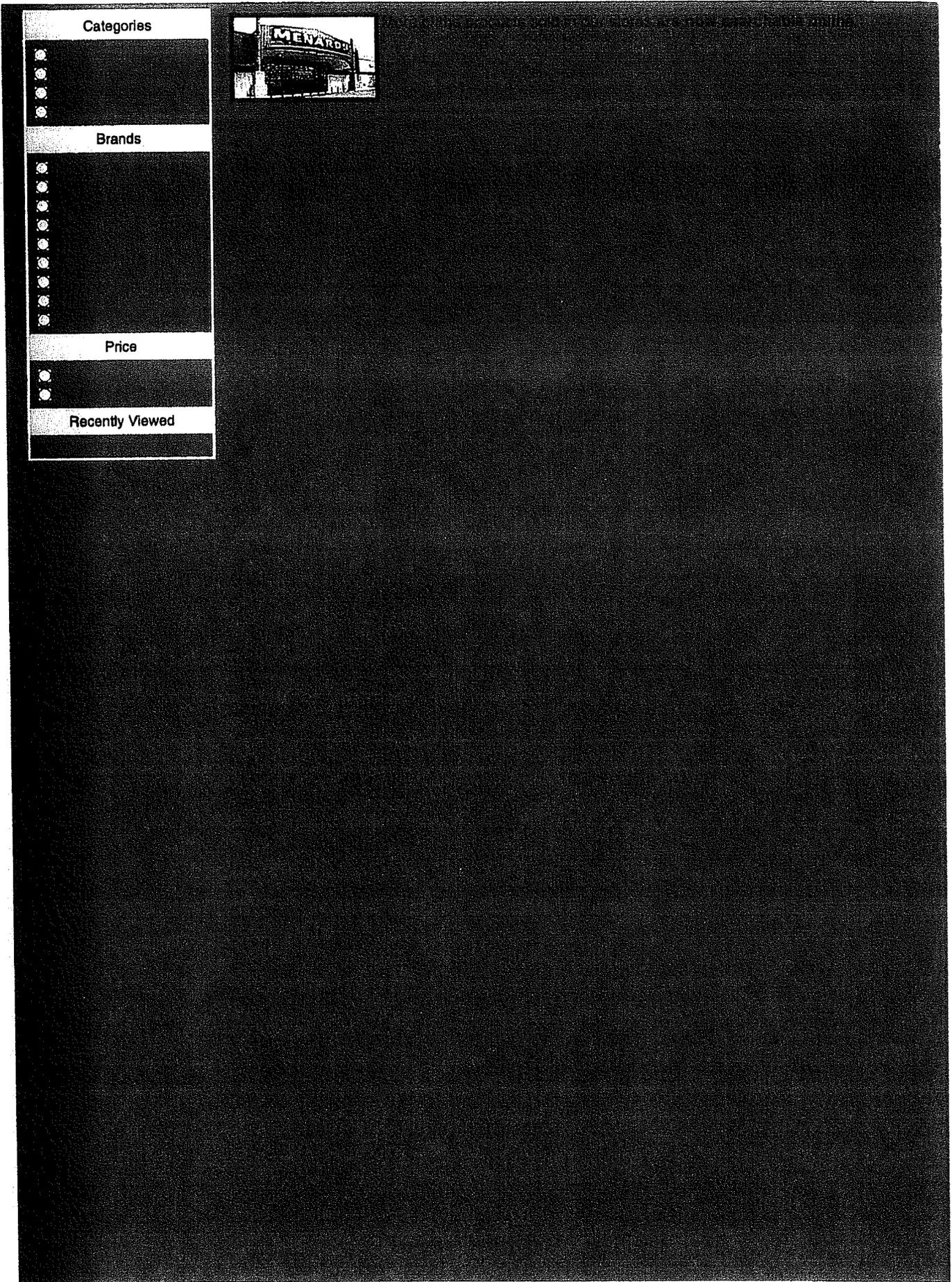
[Rebate Center](#) | [Order Tracker](#) | [Store Locator](#)

[Log In](#) | [My Account](#) | [Wish List](#) | [Shopping Cart](#)

Enter SKU, Model # or Keyword



Search -> drain out enzyme build up remover



Categories

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Brands

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Price

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Recently Viewed

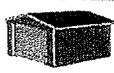


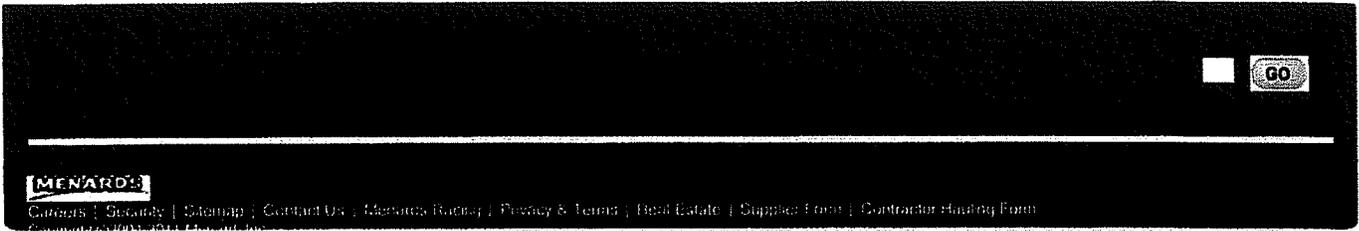
All Products (23) Online Products (4) Store Products (23) How To (18) Pages (488)

GO

20

Best Match

 <p>Details</p> <p>Formbys Build-Up Remover 8 oz Sku: 5556106 Model: 30016</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Krud Kutter Ultra Power Remover 16 oz 16 oz. Sku: 5616070 Model: UP16_6</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>32 oz. Drain Free Build-Up Remover - Liquid 32 oz. Sku: 6471261 Model: DE11B</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Drano Max Build-Up 64oz 64 oz. Sku: 6471614 Model: 10115</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>
 <p>Details</p> <p>1.5 Lb Drainout Enzyme Sku: 6471309 Model: EP06N</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Micro Channel Clean Out - White White Model: 8651</p> <p>Online Price [Ⓢ] \$8.56 Enter Your Zip Code for Store Information</p> <p>Select a Store & Buy</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Micro Channel Clean Out - White Sand Model: 8652</p> <p>Online Price [Ⓢ] \$8.56 Enter Your Zip Code for Store Information</p> <p>Select a Store & Buy</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Micro Channel Clean Out - White Gray Model: 8653</p> <p>Online Price [Ⓢ] \$8.56 Enter Your Zip Code for Store Information</p> <p>Select a Store & Buy</p> <p>Add to Wishlist</p>
	 <p>Details</p>	 <p>Details</p>	 <p>Details</p>



A dark search bar with a white 'GO' button on the right side. Below the search bar, the Menards logo is visible on the left, followed by a horizontal line and a list of navigation links: [Home](#) | [Specialty](#) | [Sitemap](#) | [Contact Us](#) | [Menards Racing](#) | [Privacy & Terms](#) | [Real Estate](#) | [Supplier Login](#) | [Contractor Billing Form](#)



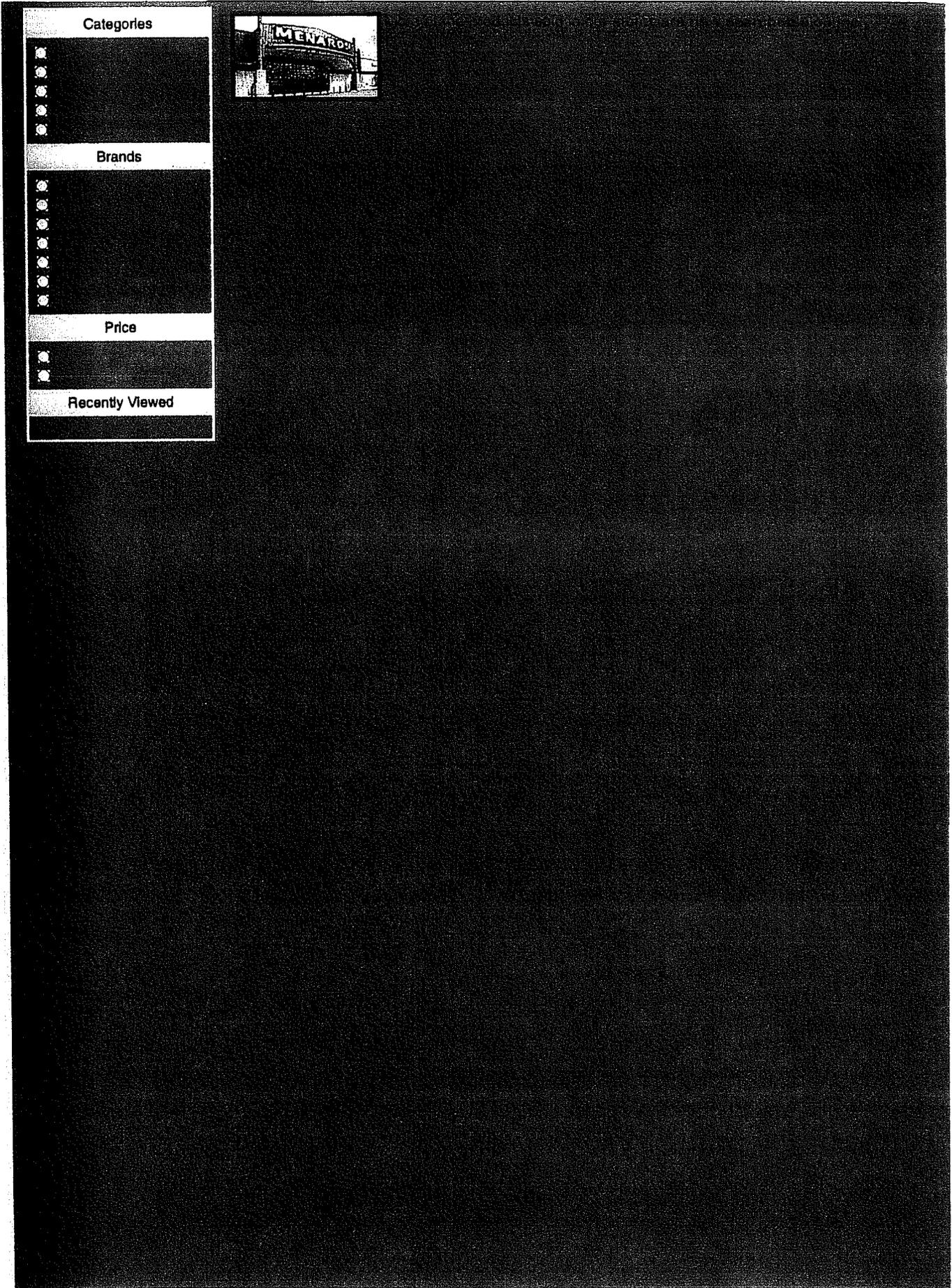
[Rebate Center](#) | [Order Tracker](#) | [Store Locator](#)

[Log In](#) | [My Account](#) | [Wish List](#) | [Shopping Cart](#)

Enter SKU, Model # or Keyword



Search for: Drain Out Enzyme septic system treatment



The main content area of the page is a large, dark, grainy rectangle that appears to be a search results grid. It is mostly obscured by a heavy black overlay, with only a few faint, illegible shapes visible. This suggests that the search results are either blank or have been completely redacted.

Categories

-
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Brands

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Price

-
-

Recently Viewed



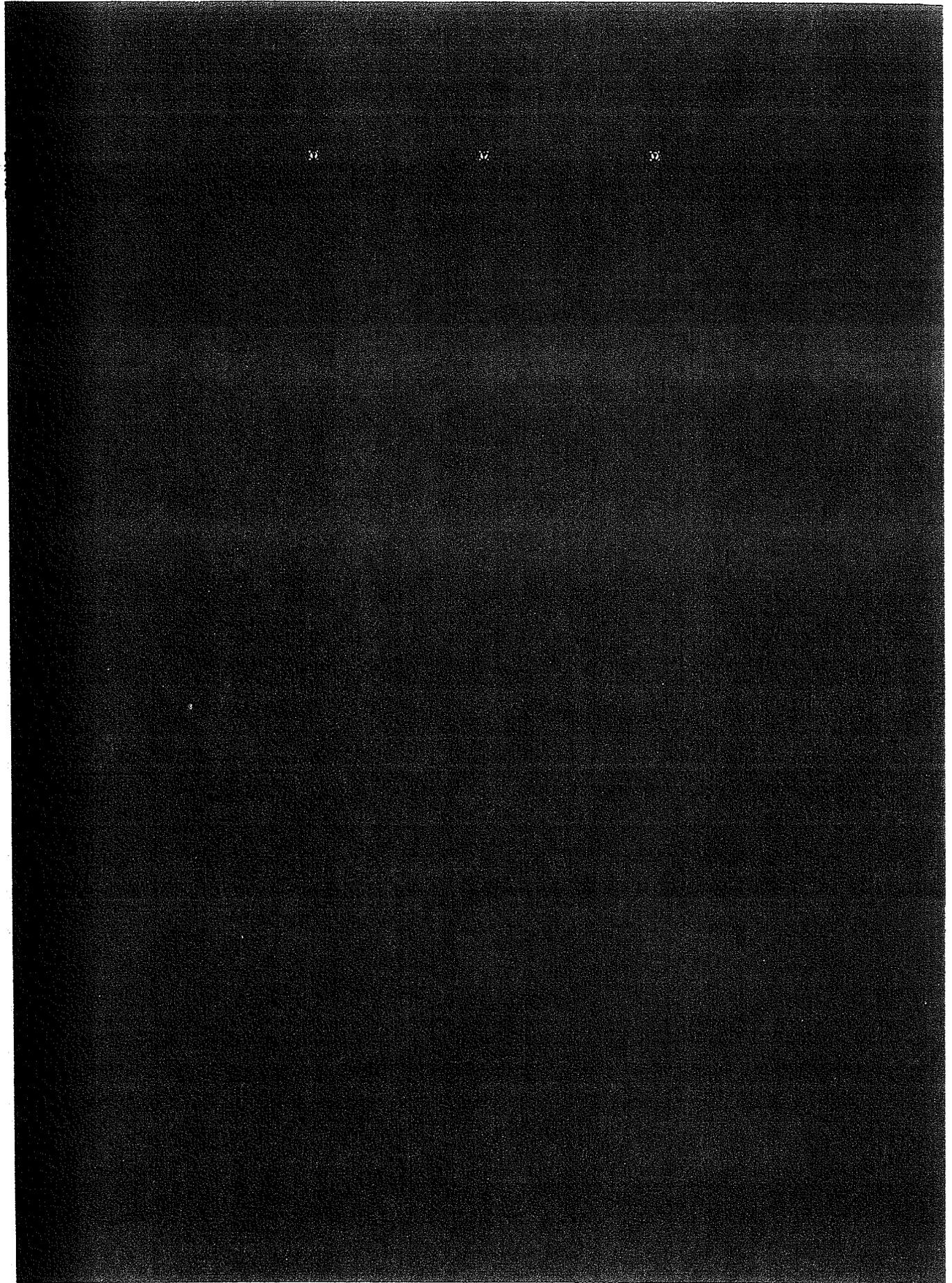
All Products (14) | Online Products (3) | Store Products (14) | How To (5) | Pages (103)



20

Best Match

 <p>Details</p> <p>Rid-X Septic System Treatment- Septi-Pacs Sku: 6471924 Model: 84249</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Rid-X Septic System Treatment Sku: 6471941 Model: 80307</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>28Oz CLR Septic Treatment Sku: 6471348 Model: SEP-6</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>1.5 Lb Drainout Enzyme Sku: 6471309 Model: EP06N</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>
 <p>Details</p> <p>Cloroben - Bacta-Life - Septic System Bacterial Activator Light Tan Powder 25 Lb. Model: 222041</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Cloroben - Bacta-Life - Septic System Bacterial Activator Light Tan Powder 1 Lb. Model: 222031</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Cloroben - Septic-Flow Opaque Green 1/2 Gallon Model: 139302</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>	 <p>Details</p> <p>Breakthru- Septic Tank and Cesspool Maintainer-Light Green Liquid 1 Quart Model: 20510</p> <p>Enter Your Zip Code for Local Price & Status</p> <p>Not Available Online</p> <p>Add to Wishlist</p>
			





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Opposition No.: 91197243

IOIP Holdings, LLC,)
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 v.)
)
Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 13



New customer? Sign In Help

Value of the Day Local Ad: Store Finder Registry Gift Cards Track My Orders My Account My Lists

See All Departments

Search All Departments

drain out

601

My Cart

Indianapolis

My Store: Indianapolis

Search results for "drain out"

Search In:

Matching Departments

Home Improvement

Plumbing & Fixtures (1)

Plumbing Tools (1)

Refine Results

Clear All & Update

Update Results

Brand

Elizabethan Classics (1)

Price

\$0 - \$20 (1)

\$20 - \$50 (1)

Retailer

Walmart.com (1)

Wayfair (1)

Update Results

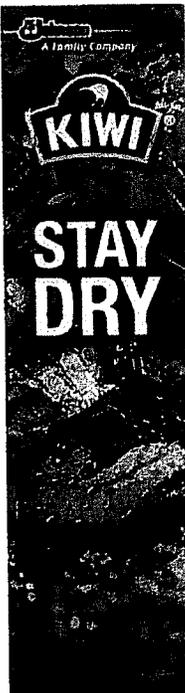
Recently Viewed Items



\$19.97

Clear this list

ADVERTISEMENT



We found 2 results for "drain out" in all departments

All Items (2)

In My Store - Indianapolis(0)

Online Items (1)

Sort by Best

Items 1- 2 of 2 total

List View Grid View



Drain Out Crystal Drain Cleaner

- Commercial grade
- Great for sewers, grease traps and drains
- Ideal substitute for sulfuric acid

Store pricing may vary

See store availability

Product availability and pickup options are displayed for this store. To change your store, choose an option below.

Walmart store: Indianapolis 7325 N Keystone Ave

Walmart store: Indianapolis 3221 W 86Th St

Walmart store: Carmel 2001 E 151St St

See More Stores



Elizabethan Classics Pull-Out Bathroom Sink Drain with Chain Stay

Complete your bathroom sink with a Pull-Out Sink Drain with Chain Stay by Elizabethan Classics. Designed to fit a 1-...

Online

\$40.00 -

\$47.60

Sold & shipped by Wayfair

Items 1- 2 of 2 total

Top of Page

View: All Items (2)

My Store Indianapolis(0)

Online Items (1)

Sort by Best Match

What Do People Ultimately Purchase After Searching For Items You Searched For?

Top of Page



21% buy Premier Copper Products 3.5" Bar Sink

★★★★★ \$29.99



21% buy Frigidaire 70 Pint Dehumidifier, White

★★★★★ \$198.00



16% buy Great Neck 205 Pc Home Tool Set

★★★★★ \$49.98



16% buy General Electric 30-Pint Dehumidifier

★★★★★ \$149.54



16% buy Black & Decker, 12V Drill Tool Accessory Kit

★★★★★ \$67.97

Search Classifieds for drain out | Sell your used items

Sponsored Links what's this?

Out Drain Compare Out Drain Prices, Discounts & More www.private-offer.com

Indianapolis Plumber Reliable Plumbing Service. 23 Years Experience. 24-Hour Service. www.bedplumbinginc.com

Drainage Everything you need to know about Drainage www.ask.com/Drainage

Did you find the product or service you were searching for?

Yes No

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Walmart.com About Walmart.com Terms of Use Affiliate Program

Stores & Corporate Store Finder Corporate Website Diversity

Help Help Center Track Your Order Returns Policy



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[Return an Item](#)
[Product Recalls](#)
[Contact Us](#)
[Feedback \[?\]](#)

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New customer? Sign In Help

Value of the Day Local Ad Store Finder Registry Gift Cards Track My Orders My Account My Lists

See All Departments

Search All Departments

lime out

GO

My Cart

Indianapolis

Search results for "lime out"

Search In:

Matching Departments

Grocery

Household Essentials (1)

Recently Viewed Items

- Playskool
- Explore 'N
- Grow Busy
- Ball Popp...
- ★★★★

\$19.97

Clear this list

ADVERTISEMENT

We found 1 result for "lime out" in all departments

All Items (1)

In My Store - Indianapolis(1)

Online Items (0)

Sort by Best Match

Items 1- 1 of 1 total

List View Grid View



Lime Out Kitchen and Bath Cleaner

- Extra thick formula
- Quickly dissolves lime, rust, calcium and mineral deposits
- Easy to use

Store pricing may vary

See store availability

Items 1- 1 of 1 total

Top of Page

View: All Items (1)

In My Store - Indianapolis(1)

Online Items (0)

Sort by Best Match

Search Classifieds for lime out | Sell your used items

Sponsored Links

Need Lime Out? Find Lime Out Cleaner Here Shop From Over 45,000 Products www.hardwarestore.com

Lemon.com Lemon is the sweetest way to keep track of all your purchases www.lemon.com

You have time for lime. Didn't get lime spread this fall? Apply anytime for higher yields! www.calciumproducts.com

Kill Deer Ticks Eliminate Lyme Disease Ticks Eco-friendly and targeted www.ticktubes.com

Did you find the product or service you were searching for? YES NO

Financial Services Walmart MoneyCenter

Walmart.com About Walmart.com Terms of Use Affiliate Program International Customers About Our Ads Popular Searches See All Departments

Stores & Corporate Store Finder Corporate Website Diversity Investor Relations Privacy & Security Associate Discount California Privacy Rights Careers at Walmart @WalmartLabs Sponsorship Submission

Help Help Center Track Your Order Returns Policy Return an Item Product Recalls Contact Us Feedback (4)

Special Buy (2)

Free Pickup Options

- Free Shipping: Site to Store (5)
- Store Pickup (4)

Retailer

- PlumStruck (1)
- Pro Team (1)
- ToolKing.com (1)
- Walmart.com (28)
- Wayfair (54)

[Update Results](#)

ADVERTISEMENT

kraft foods
every day with it.



Renuzit Super Odor Neutralizer Spray, After the Rain

Online
\$2.18

[See store availability](#)

- This **home free** item ships free with qualifying \$45 order



White House White-Out

Format: Paperback
Author: Roy, Ron
★★★★★

Online
\$3.04
List Price: ~~\$4.99~~
You save: **\$1.95 (39%)**

Paperback, Random House Childrens Books, 2008, ISBN13 9780375847219, ISBN10 0375847219

- Free shipping to store

DC Super Friends: Heroes United!/Attack of the Robot! [With Punch-Out Play Set]



Format: Paperback
Author: Shealy, Dennis

Online
\$4.24
List Price: ~~\$4.99~~
You save: **\$0.75 (15%)**

Paperback, Random House Books for Young Readers, 2008, ISBN13 9780375844096, ISBN10 0375844090



Super Iron Out

- Safe, effective acid free formula
- Dissolves rust stains without scrubbing
- Safe for use on most surfaces

\$12.97
Store pricing may vary

[See store availability](#)

- Free store pickup today - order online now



Salon Grafix Professional Shaping Unscented Super Hold Styling Mist Hold 8 Hair Spray 10 oz, 2pk

Online
\$10.54

- This **home free** item ships free with qualifying \$45 order



Iron Man: The Ultimate Guide to the Armored Super Hero

Format: Hardcover
Author: Manning, Matthew K.

Online
\$16.00
List Price: ~~\$24.99~~
You save: **\$8.99 (36%)**

Hardcover, Dk Pub, 2010, ISBN13 9780756657499, ISBN10 0756657490

[See store availability](#)

Creative Teaching Press Super Cut-outs Handprint 36/pk 5in

Use these colorful, reversible shapes for patterning activities and bulletin board borders and to add interest to ar..

Online
\$3.98

- Sold & shipped by Wayfair



New customer? Sign In Help

Value of the Day Local Ad Store Finder Registry Gift Cards Track My Orders My Account My Lists

See All Departments

Search All Departments

super iron out spray 50

My Cart

Indianapolis

Search results for "super iron out spray"

Search In:

Matching Departments

Beauty

- Beauty Days (2)
- Hair Care (11)

Home

Home Improvement

Toys

Health

Pets

Sports & Fitness

Books

Pharmacy

Grocery

Auto & Tires

Refine Results

Clear All & Update

Update Results

Brand

- Aqua Net (2)
- Black & Decker (2)
- Cam Spray (3)
- Fontaine (1)
- Fx Special Effects (1)
- Hamilton Beach (1)
- La Bella (1)

Price

- 0 - \$20 (37)
- \$20 - \$50 (3)
- \$50 - \$100 (1)
- \$100 - \$150 (4)
- \$150 - \$200 (15)
- \$200 - \$250 (13)
- \$250 - \$500 (5)

Customer Rating

- 4 - 5 Stars (8)
- 2 - 2.9 Stars (1)
- 1 - 1.9 Stars (1)

Color

- Black (1)
- Blue (1)

Special Offers

- 97 Cent Shipping (1)
- Award-Winning (6)
- Home Free (18)
- New (1)
- Reduced Price (1)

We found 85 CLOSE matches for "super iron out spray"

We found 0 EXACT matches for "super iron out spray"

Related Searches: pull-out spray, flat iron spray, iron spray, iron out, pull-out spray kitchen

Showing all CLOSE matches

All Items (85)

In My Store - Indianapolis(9)

Online Items (75)

Sort by Best Match

Items 17- 32 of 85 total

16 32

Per Page

List View

Grid View

Previous 1 2 3 4 5 ... Next



Paul Mitchell Firmstyle Freeze and Shine Super Spray, 8.5 oz

Online \$11.78

- This home free item ships free with qualifying \$45 order



Fx Special Effects Sheer Silky Smooth Heat Memory Flat Iron Spray, 6 fl oz

Online \$4.47

★★★★★

- This home free item ships free with qualifying \$45 order

See store availability



Rust-Oleum Multicolor Textured Spray, Aged Iron

\$5.77 Store pricing may vary

- Indoor/Outdoor
- Durable, corrosion-resistant
- Premium high-end look

See store availability

- Free store pickup today - order online now



Super Pet CritterTrail Lazy Look-Out Accessory Kit

Online \$8.00

★★★★★

- Lazy Look-out Accessory is a great look-out tower that also doubles as a safe nesting area
- Bubble wave Fun-n.

- Free shipping to store

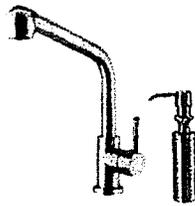


Iron Out Automatic Toilet Bowl Cleaner

Online \$7.99

Features: -Toilet bowl cleaner.-Repels rust with every flush.-Long lasting break through formula.-Keeps toilet bowl

- Sold & shipped by Wayfair

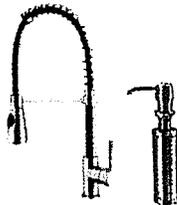


Vigo Industries Pull-Out Spray Kitchen Faucet with Soap Dispenser in Stainless Steel

Online
\$173.40

Features: -Pull-out spray kitchen faucet.-Features a dual pull-out spray head for aerated flow or powerful spray.-Hi...

• Sold & shipped by Wayfair

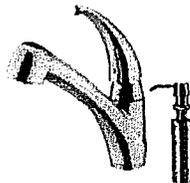


Vigo Industries Pull-Out Spray Kitchen Faucet with Soap Dispenser

Online
~~\$195.00~~
\$221.40

Features: -Pull-out spray kitchen faucet.-Features spiral and dual pull-out spray head for aerated flow or powerful

• Sold & shipped by Wayfair



Vigo Industries Pull-Out Spray Kitchen Faucet with Soap Dispenser in Stainless Steel

Online
\$263.40

Features: -Pull-out spray kitchen faucet.-Features a dual pull-out spray head for aerated flow or powerful spray.-Hi...

• Sold & shipped by Wayfair



Vigo Industries Pull-Out Spray Kitchen Faucet with Soap Dispenser in Chrome

Online
\$185.40

Features: -Pull-out spray kitchen faucet.-Features dual pull-out spray head for aerated flow or powerful spray.-High.

• Sold & shipped by Wayfair

Items 17- 32 of 85 total **16 32** Per Page

◀ Previous 1 2 3 4 5 ... Next ▶ **Top of Page**

View: **All Items (85)** In My Store - Indianapolis(9) Online Items (75)

Sort by: **Best Match**

People Who Searched For Similar Items Also Viewed

Top of Page



Tight End
\$3.21



Football Double Threat

site **\$4.99**



The Bailey School Kids #27: Bogeymen Don't...

site **\$4.79**



I Got a "D" in Salami

site **\$3.04**



A to Z Mysteries: The Panda Puzzle

site **\$4.99**

Search Classifieds for super iron out spray | Sell your used items

Sponsored Links What's this?

Super Iron Out
You are looking for **Super Iron Out**? **Super Iron Out** offers!
www.getaspecialdeal.com/Super+Iron+Out

Super Iron Out Info
Get Info On **Super Iron Out** Access 10 Search Engines At Once.
www.info.com/SuperIronOut

MTN Spraypaint 300+ Colors
High quality triple thick no drip all-weather all-use **spray** paint

www.33third.com

Super cheap Metal Spray

Over 6,000 shops & 23 Mil products. BEST-DEAL.com - the shop expert!
www.metal-spray.best-deal.com

Metal Out

Save on Metal **Out** Pool Cleaners. Low Prices Free Next Day Delivery!
www.doheny.com

Metal Out

Best Selection & Price on Chemicals Free Shipping and Lowest Prices!
poolsuppliesuperstore.com/Chemical

Did you find the product or service you were searching for?

YES NO

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Walmart MoneyCenter



Walmart Credit Cards

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Manage Account & Pay Bill

Walmart.com

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Terms of Use

Affiliate Program

International Customers

About Our Ads

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Store Finder

Corporate Website

Diversity

Investor Relations

Privacy & Security

Associate Discount

California Privacy Rights

Careers at Walmart

@WalmartLabs

Sponsorship Submission

Help

Help Center

Track Your Order

Returns Policy

Return an Item

Product Recalls

Contact Us

Feedback [1]

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Opposition No.: 91197243

IOIP Holdings, LLC,)
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 Ontel Products Corporation,)
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 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 14



[Login](#)
[Register](#)
[My Cart](#)



- [Automotive](#)
- [Bird & Wildlife Care](#)
- [Clothing & Footwear](#)
- [Equine](#)
- [Farm & Ranch](#)
- [Fencing](#)
- [Home & Toys](#)
- [Home Improvement](#)
- [Hunting](#)
- [Lawn & Garden](#)
- [Livestock](#)
- [Pet Care](#)
- [Power Equipment](#)
- [Tires & Batteries](#)
- [Tools & Welding](#)

Search

 Find A Store

Home > Search > All Categories



Results Per Page: 12

Sort: Price Ascending

Facebook Public Profile
 Login to see this content

E-Mail Offers
 Sign up today to receive newsletters and other special offers in your inbox.



Drain Out Extra, 32 Oz

Model#: DE32N
 SKU #: 102772009

\$3.99

compare product



Drain Out Extra, 64 Oz

Model#: DE64N
 SKU #: 107294693

\$5.99

compare product



Brower

Performance One E-Drink

Model#: MPO17E
 SKU #: 102490112

\$329.99

compare product

Narrow by

Category
 Select

Price
 Select

Brand
 Select

Results Per Page: 12

Sort: Price Ascending



Answers & Low Prices Down Every Aisle SM

Browse Sale Flyer

- [Automotive](#)
- [Bird & Wildlife Care](#)
- [Clothing & Footwear](#)
- [Equine](#)
- [Farm & Ranch](#)
- [Fencing](#)
- [Home & Toys](#)
- [Home Improvement](#)
- [Hunting](#)
- [Lawn & Garden](#)
- [Livestock](#)
- [Pet Care](#)
- [Power Equipment](#)
- [Tires & Batteries](#)
- [Tools & Welding](#)

Search Find A Store

Home > Search > All Categories



Facebook Public Profile

Login to see this content

E-Mail Offers

Sign up today to receive newsletters and other special offers in your inbox.

Narrow by

Category

Select

Price

Select

Brand

Select

Home Improvement

has (255) matches [view all](#) or filter by subcategory [Select a subcategory](#)



[Super Iron Out, 30 Oz](#)

Model#: IO30N
SKU #: 107292318

\$5.99

compare product



[Super Iron Out](#)

Model#: IO65N
SKU #: 102740317

\$14.89

compare product



[Iron Out Automatic Toilet Bowl Cleaner](#)

Model#: AT12T
SKU #: 107294892

\$4.39

compare product

Pet Care

has (108) matches [view all](#) or filter by subcategory [Select a subcategory](#)



[Happy Jack](#)

[Seal N' Heal Liquid Bandage Spray](#)

Model#: 1031
SKU #: 107312401

\$8.99

compare product



[Vet'S Best](#)

[Dog Hot Spot Spray](#)

Model#: 3165810007
SKU #: 107306764

\$8.99

compare product



[Nutri-Vet](#)

[Antimicrobial Wound Spray for Dogs](#)

Model#: 99822
SKU #: 107312414

\$5.99

compare product

Lawn & Garden

has (58) matches [view all](#) or filter by subcategory [Select a subcategory](#)



Bonide

Wasp & Hornet Spray 15 Oz

Model#: 612391
SKU #: 101001427

\$3.99

compare product

Nozzle Fan Spray W/spike

Model#: 60141
SKU #: 109670939

\$2.99

compare product

Trimec Ready Spray Lawn
Weed Killer 32 Oz

Model#: 827480
SKU #: 101267489

\$12.99

compare product

Automotive

has (63) matches [view all](#) or filter by subcategory [Select a subcategory](#)



Black Magic

Tire Wet Spray Tire Care 23 Oz

Model#: BM23
SKU #: 107306090

\$5.79

compare product



Sea Foam

Sea Foam Engine Spray

Model#: SS-14
SKU #: 107309269

\$8.99

compare product



South Win

Rain-X D-Icer with Trigger
Spray

Model#: 5075518
SKU #: 107302448

\$3.99

compare product

Livestock

has (46) matches [view all](#) or filter by subcategory [Select a subcategory](#)



Little Giant

Green Professional Spray
Bottle

Model#: PS32GREEN
SKU #: 101167510

\$2.99

compare product



Little Giant

Blue Professional Spray Bottle

Model#: PS32BLUE
SKU #: 101167503

\$2.99

compare product



Straight Arrow

Spray Away Horse Body Wash
- 32 Oz. Bottle

Model#: 544958
SKU #: 101015073

\$14.79

compare product

Tools & Welding

has (177) matches [view all](#) or filter by subcategory [Select a subcategory](#)



Porter Cable

Spray Air Gun High Volume
Low Pressure Gravity

Model#: PSH1
SKU #: 107943825

\$119.99



Pro Powermate

Commercial Air Spray Paint
Gun

Model#: 010-0014SP
SKU #: 101512006

\$69.99



Powermate

Heavy Duty Air Paint Spray
Gun

Model#: 010-0013CT
SKU #: 101511000

\$42.99

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Equine

has (27) matches [view all](#) or filter by subcategory [Select a subcategory](#)



Manna Pro

Equine Fly/Mosquito Spray Rtu 32 Oz

Model#: 0593405864
SKU #: 101407996

\$4.99

compare product



Manna Pro

Equine Fly/Mosquito Spray Rtu Gallon

Model#: 0593405865
SKU #: 101407998

\$11.99

compare product



Gordon's Chemicals

Horse Stable Spray 32 Oz

Model#: 7881112
SKU #: 102141191

\$7.99

compare product

Farm & Ranch

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Spray Tank Cleaner 1 Oz



Nutra Sol

Spray Tank Cleaner 1 Oz

Model#: NUTRA SOL 1 OZ TANK CLEANER
SKU #: 107298094

\$2.99

compare product



Fimco

ATV Spray Boom Kit

Model#: 5301231
SKU #: 101278861

\$159.99

compare product

Spray Tip Adapter 11/16 Unc X 1/4 Fpt

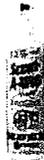
Model#: 1116 A
SKU #: 101135821

\$1.89

compare product

Hunting

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Hunters Specialties

Scent A Way Plus Spray Bottle

Model#: 01176
SKU #: 107287390

\$6.99

compare product



Hunters Specialties

Scent A Way Spray 12 Oz

Model#: 01174
SKU #: 101017614

\$5.99

compare product



Hunters Specialties

Scent Elimination System Basic

Model#: 01113
SKU #: 107300615

\$19.99

compare product

Clothing & Footwear

has (125) matches [view all](#) or filter by subcategory [Select a subcategory](#)



Muck

Muck Chore Boot

Model#: CHH00AA
SKU #: 101088317

Starting At: \$94.95

compare product



Servus

Knee Boot Max

Model#: 75120
SKU #: 101088313

Starting At: \$27.99

compare product



CLC

Super Therm Lined Gripper
Gloves

Model#: 2032L
SKU #: 107301481

\$6.99

compare product

Home & Toys

has (13) matches [view all](#) or filter by subcategory [Select a subcategory](#)



Stansport

Cast Iron Cookware Set

Model#: 16903
SKU #: 107286582

\$59.99

compare product



Harper

Scrub Brush Iron Handle

Model#: 193
SKU #: 107295513

\$4.99

compare product



Harper

Scrub Brush Iron Handle

Model#: 48220-2
SKU #: 107295455

\$2.99

compare product

Tires & Batteries

has (14) matches [view all](#) or filter by subcategory [Select a subcategory](#)



Ken Tool

Tire Iron Mount/Demount W/Tip

Model#: 34644
SKU #: 101278950

\$75.99

compare product



Ken Tool

Bead Breaking Tool Driving
Iron 11 - 3/4" (30 cm)

Model#: 32126
SKU #: 109000166

\$36.99

compare product



Hi-Run

Sutong Tire 20X10.0-8 4-Ply
Super Lug

Model#: WD1056
SKU #: 107304782

\$66.99

compare product

Bird & Wildlife Care

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Ips Carefree Enzymes Hummingbird & Oriole Feeder Cleaner

Model#: 98557
SKU #: 107300894

\$8.99

compare product

Suet Single Cake Feeder

Model#: Q18
SKU #: 101207657

\$3.99

compare product

Opus Scoop N Fill

Model#: 300
SKU #: 107302378

\$4.49

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Fencing

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Gallagher

[Super Strain Insulator 5 Pack](#)

Model#: G678124
SKU #: 101419027

\$9.49

compare product



Splice It

[Gaucho Splices](#)

Model#: GB5
SKU #: 102800202

\$11.99

compare product



Splice It

[Wire Splices](#)

Model#: LBW5
SKU #: 102800139

\$11.99

compare product

Power Equipment

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Supertrim

[Super Trim Trimmer Line](#)

Model#: SU080D1/2-12
SKU #: 107200089

\$5.99

compare product



Supertrim

[Trimmer Line Super Trim .105 1Lb](#)

Model#: SU105D1-12
SKU #: 107200124

\$10.99

compare product

Supertrim

[Trimmer Line Super Trim .080 1Lb](#)

Model#: SU080D1-12
SKU #: 107200108

\$10.99

compare product

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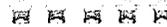
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Super Iron Out Rust Stain Remover, 1 Lb

\$7.99

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Super Iron Out, 5 Lb Granular

\$16.99

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Multi-Surface Super Iron Out Rust Stain Remover, 16 oz

\$5.69

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Iron Out Automatic Toilet Bowl Cleaner

\$5.79

Similar Items by Category:

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Whirl Out Whirlpool Cleaner

\$7.99

Similar Items by Category:

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Drain Out Enzyme Build Up Remover, 32 oz

\$9.99

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Lime Out Extra, 24 oz

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Drain Out Crystal, 18 oz

\$6.99

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Drain Out Enzyme Septic System Cleaner, 24 oz
\$11.49 [ADD TO CART](#)

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Liquid Drain Opener, 1/2 Gal
\$8.49 [More Info](#)

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• [Iron Out](#)



Cast Iron Cleanout Door, 8" x 8"
\$38.99 [ADD TO CART](#)

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Cast Iron Cleanout Door, 8" x 12"
\$47.99 [ADD TO CART](#)

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• [Marshall Stamping](#)



Super Dog Tie Out Stake, 200 Lbs
\$35.99 [ADD TO CART](#)

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• [Dog Runs & Tie-Outs](#)
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Super Trim Spray Adhesive, 19 oz
\$19.49 [More Info](#)

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Rustoleum MultiColor Textured Spray Paint, 12 oz Aged Iron
\$7.99 [ADD TO CART](#)

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• [Rust-Oleum](#)

3M Super 77 Spray Adhesive, 7 oz
\$8.99 [More Info](#)

Similar Items by Category:
• [Spray Adhesives](#)
• [3M Company](#)

Super Dog Tie Out Cable, 15' Silver
\$10.29 [ADD TO CART](#)

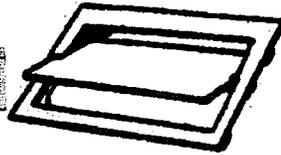
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• [Four Paws](#)



Super Dog Tie Out Cable, 20' Silver

\$14.99 [ADD TO CART](#)

- Similar Items by Category:
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 - [Four Paws](#)



Cast Iron Ash Dump, 4 1/2" x 9"

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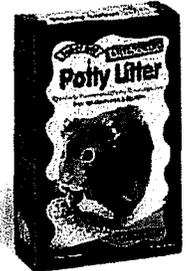
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- [Cage & Hutch Accessories](#)
 - [Super Pet](#)



Crittertrail Out House Litter

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3M Super 77 Spray Adhesive, 16.5 oz

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- [Spray Adhesives](#)
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 On orders over \$250. Subject to credit approval.

AVAILABILITY: In stock, leaves warehouse in 1 - 7 full bus. days. - (details)

STORE AVAILABILITY: Your neighborhood Ace stocks thousands of products in the quantities you need. Check with your local Ace for availability. ([find your local Ace](#))

PRODUCT DETAILS

- 2.1 oz. twin pack
- Contains two tablets per pack
- Keeps bowl/toilet stain free
- Safe for plumbing and septic tanks
- Each tablets lasts up to 30 days

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What are you looking for?



Super Iron Out 5 Lb. Rust and Stain Remover

Item #: 26946 | Model #: IO65N

☆☆☆☆☆

5 Lb. Rust and Stain Remover

- All purpose rust and stain remover

Type	Powder	Unit of Measure	Quantity	80.0
Scent	None	Unit of Measure		Ounces

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Not Yet Rated

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Item #: 239114 Model #: 459-58-60X120-000

- Stain and impact resistant
- Endless design possibilities
- Easy to clean and maintain

Submit

Please enter your ZIP code to purchase this item.

Formica Brand Laminate 48" x 144" Brite White Laminate Countertop Sheet
Not Yet Rated

Add to Compare

Item #: 239114 Model #: 459-58-48X144-000

- Durable
- Endless design possibilities
- Easy to clean and maintain

Submit

Please enter your ZIP code to purchase this item.

Formica Brand Laminate 48" x 120" Brite White Laminate Countertop Sheet
Not Yet Rated

Add to Compare

Item #: 239114 Model #: 459-58-48X120-000

- Endless design possibilities
- Easy to clean and maintain
- Stain and impact resistant

Submit

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Formica Brand Laminate 60" x 96" Brite White Laminate Countertop Sheet
Not Yet Rated

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Item #: 239114 Model #: 459-58-60X096-000

- Endless design possibilities
- Easy to clean and maintain
- Stain and impact resistant

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Trim
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PARAGRAPH 18

SUPER IRON OUT STAIN REMOVER

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SKU Number: 2519021
Stain Remover; 10 lbs Size; Iron Out Type;
Bottle; White Color

DETAIL DESCRIPTION Technical Specifications Reviews

Quickly and easily removes even the toughest rust and iron stains from white clothes, toilets, sinks tubs, dishwashers, exterior surfaces and much more. It also keeps water softeners clean and operating at peak efficiency. Removes rust stains for several different surface types.

DETAIL DESCRIPTION

Quickly and easily removes even the toughest rust and iron stains from white clothes, toilets, sinks tubs, dishwashers, exterior surfaces and much more. It also keeps water softeners clean and operating at peak efficiency. Removes rust stains for several different surface types.

TECHNICAL SPECIFICATIONS

Size: 10
Type: Iron Out
Appearance: Bottle
Color: White

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Super Mario Bros. Super Show!: Mario's Adventures Out West/Mario Spellbound [2 Discs] (DVD)

\$7.99 \$9.99

ADD TO CART

Bob Harper: Inside Out Method - Pure Bum Super Strength (DVD)

\$9.99 \$14.99

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Super Iron Out Stain Remover, Rust, 1 lb 14 oz (850 g)

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Item #: 608743



Compare Item

Please [Select A Club](#) to view price

Please [Select A Club](#) for pick up

Add these items to a list?

Login

Highlander Deluxe Cedar Play Set with Slide

Original Price \$1099, Save \$100

More than a swing set, the Highlander is a deluxe multilevel, full-featured outdoor activity center.

Item #: 337453

In Stock

[Write a Review](#)

Compare Item

\$999.00
Online

0 Have it shipped

Please [Select A Club](#) for pick up

Hostess®

Add these items to a list?

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Hostess® Variety Pack - 8 Twinkies & 8 Cupcakes

Hostess Variety Pack Includes two of the most desired cream filled snack cakes: 8 Twinkies and 8 Cupcakes.

Item #: 75457

[Write a Review](#)

Compare Item

Please [Select A Club](#) to view price

Please [Select A Club](#) for pick up

Add these items to a list?

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Traditional Barrel Charcoal Barbeque Grill

This charcoal grill is perfect for all occasions with 580 sq. in. of cooking space.

Item #: 641173

In Stock

◆◆◆◆◇ (6)

Compare item

\$99.88
Online

Have it shipped

Please [Select A Club](#) for pick up

Hostess®

Add these items to a list?

Login



24 Gallon-Per-Day RO Membrane

The Replacement RO Membrane will fit most standard RO systems on the market.

Item #: 473180

In Stock

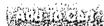
◆◆◆◆◆ (2)

Compare Item

\$38.12
Online

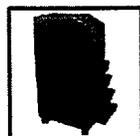
0 Have it shipped

Please [Select A Club](#) for pick up



Add these items to a list?

Login



Salon Lockable Rolling Cart

This lockable rolling cart features three metal appliance holders and a hideaway door.

Item #: 786043

In Stock

◆◆◆◆◆ (1)

Compare Item

\$169.89
Online

0 Have it shipped

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Add these items to a list?

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CharGriller Outlaw Charcoal Grill

The "Bad Boy" of barrel-style grilling.

Item #: 427497

In Stock

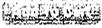
[Write a Review](#)

Compare Item

\$178.88
Online

Search Results

0 Have it shipped



Add these items to a list?

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Kalorik Steam Iron with Thermocolor System - Pink

Thermo-Color technology indicates the heat setting you are on by illuminating the water tank.

Item #: 418433

In Stock

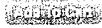
[Write a Review](#)

Compare Item

\$45.36
Online

0 Have it shipped

Please [Select A Club](#) for pick up



Add these items to a list?

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CharGriller Pro Deluxe Charcoal Grill

The traditional barrel-style grill - fantastic!

Item #: 427539

In Stock

[Write a Review](#)

Compare item

\$129.88
Online

0 Have it shipped



Add these items to a list?

Login



Kalorik Steam Iron with Retractable Cord - Pink

This steam iron features auto-shut off, a stainless steel soleplate, anti drip & a cord rewinder.

Item #: 418421

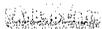
In Stock

[Write a Review](#)

Compare Item

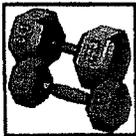
\$39.34
Online

0 Have it shipped



Add these items to a list?

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Hex Dumbbell with Ergonomic Handle - 40 lbs.

Turn your home gym into a comprehensive fitness center with this hex dumbbell from Champion.

Item #: 340719

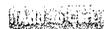
In Stock

[Write a Review](#)

Compare Item

\$39.88
Online

0 Have it shipped



Add these items to a list?

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Kalorik Steam Iron - Pink

This iron has a spray mist feature to remove creases and set creases.

Item #: 418496

In Stock

◆◆◆◆ (2)

Compare item

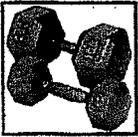
\$30.16
Online

0 Have it shipped



Add these items to a list?

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Hex Dumbbell with Ergonomic Handle - 80 lbs.

Turn your home gym into a comprehensive fitness center with these hex dumbbells from Champion.

Item #: 340810

In Stock

[Write a Review](#)

Compare item

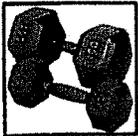
\$79.88
Online

0 Have it shipped



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Hex Dumbbell with Ergonomic Handle - 45 lbs.

Turn your home gym into a comprehensive fitness center with this hex dumbbell from Champion.

Item #: 340740

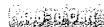
In Stock

[Write a Review](#)

Compare item

\$45.44
Online

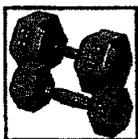
0 Have it shipped



Search Results

Add these items to a list?

Login



Hex Dumbbell with Ergonomic Handle - 35 lbs.

Turn your home gym into a comprehensive fitness center with this hex dumbbell from Champion.

Item #: 340635

In Stock

[Write a Review](#)

Compare item

\$35.44
Online

0 Have it shipped



Add these items to a list?

Login



Hex Dumbbell with Ergonomic Handle - 20 lbs.

Turn your home gym into a comprehensive fitness center with this hex dumbbell from Champion.

Item #: 338987

In Stock

[Write a Review](#)

Compare item

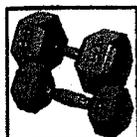
\$19.88
Online

0 Have it shipped



Add these items to a list?

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Hex Dumbbell with Ergonomic Handle - 5 lbs.

Turn your home gym into a comprehensive fitness center with these hex dumbbells from Champion.

Item #: 340838

In Stock

[Write a Review](#)

Compare item

\$4.88
Online

0 Have it shipped



Add these items to a list?

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Vulcan V60-1 60" Natural Gas 10 Burner Range with 2 Ovens

Vulcan's Restaurant Ranges offer a durable and reliable solution for all-purpose cooking, designed with the highest-quality materials including stainless steel construction, cast iron grates, heavy-duty burners and much more.

Item #: 616951

Low In Stock

[Write a Review](#)

Compare Item

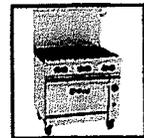
\$3,140.00
Online

0 Have it shipped



Add these items to a list?

Login



Wolf C36-S-6B 36" Natural Gas Range with 6 Burners and 1 Oven

The Challenger XL restaurant range has hard-working and easy-to-use features that produce the high-quality results all restaurants have come to expect from Wolf Ranges, all without breaking the budget.

Item #: 616382

Low In Stock

[Write a Review](#)

Compare Item

\$2,100.00
Online

0 Have it shipped



Add these items to a list?

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Birch Gel Log Set

Convert your existing fireplace into a gel fuel fireplace and never worry about hauling wood again.

Item #: 517120

In Stock

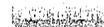
[Write a Review](#)

Compare item

\$198.36
Online

0 Have It shipped

Please Select A Club for pick up

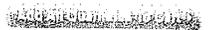


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[Compare Selected Items](#)

1-20 of 37 items | 20 40 80 per page
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Opposition No.: 91197243

IOIP Holdings, LLC,)
)
 Opposer,)
)
 v.)
)
 Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 21



Representing 4000 Stores Worldwide
"World's Largest Hardware Store"®

Store Locator | Help

CONTACT US: 260-748-7175

keyword or SKU#



Shopping Cart - 0 items

Recently Viewed | Sale Items | Categories | Brands

> Plumbing > Drain cleaners and fixtures > Chemical drain cleaners > SKU 438022



[Larger Image](#)

1-1/2lb Whirlpol Cleaner

Summit Brands
Model: W006N
Do it Best SKU: 438022



Online Price vs. In Store Price
Only available via Ship-to-Store
Free Shipping: Ship-to-Store
At participating locations
Arrives in 7-10 business days
[Learn More](#)

Have you used this product? Be



We Also Offer



[Dishwasher Cleaner](#)



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[24oz Washer Cleaner](#)

Description | Product Reviews

Summit Brands

WhirlOut® Whirlpool Cleaner

Fast, effective way to clean whirlpool systems. Removes mold, mildew, bath and body oils, soap scum, dirt, and odors. Safely cleans deep inside system pipes and pumps where bacteria can grow. Safe and effective on all acrylic, fiberglass, and chrome surfaces. 1.5 lb. canister.

Related Categories

- [Chemical drain cleaners](#)
- [Drain cleaners snakes and augers](#)

Is the online price the same as in store price?

Our goal is to offer the best possible prices on doitbest.com as well as in our Do it Best stores. Sometimes an online price will not match a price that is offered in your local store. The local price may require additional handling, may not be available or may have other factors that influence the price difference from the online price.

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CONTACT US: 260-748-7175

keyword or SKU#

STANLEY

Shopping Cart - 0 items

[Recently Viewed](#) | [Sale Items](#) | [Categories](#) | [Brands](#)

Shop

Narrow Your Results By:

- >> [Cleaning Supplies \(1\)](#)
- >> [Plumbing \(4\)](#)

Price Range

- >> [Less than \\$10 \(3\)](#)
- >> [\\$10 to less than \\$50 \(2\)](#)

Click here to request MSDS information for products purchased on doitbest.com

You searched for 'ironout'. We corrected your search to "'iron out'"
[Home](#) > 'ironout'

(5 items found) Sort By...

[128-oz Super Iron Out](#) | [16oz Liquid Iron Out](#) | [30oz Super Iron Out](#) | [5lb Super Iron Out](#)

Model: LIO4128N
SKU: 465356

Model: LIO616PN
SKU: 460818

Model: IO30N
SKU: 403735

Model: IO65N
SKU: 419782



Online Price: \$9.99

Add to Cart

[more from Chemical drain cleaners](#)

Online Price: \$5.79

Add to Cart

[more from Chemical drain cleaners](#)

Online Price: \$6.49

Add to Cart

[more from Chemical drain cleaners](#)

Online Price: \$15.49

Add to Cart

[more from Toilet Cleaners](#)

[10lb Super Iron Out](#)

Model: IO10N
SKU: 415731

Online Price: \$25.99

Add to Cart

[more from Chemical drain cleaners](#)

Online Prices may differ from in-store prices

1

Recently Viewed Items

There are no items in your Recently Viewed list
Online Prices may differ from in-store prices

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

Opposition No.: 91197243

IOIP Holdings, LLC,)
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 v.)
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 Ontel Products Corporation,)
)
 Applicant.)

Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 22

Home

About Us

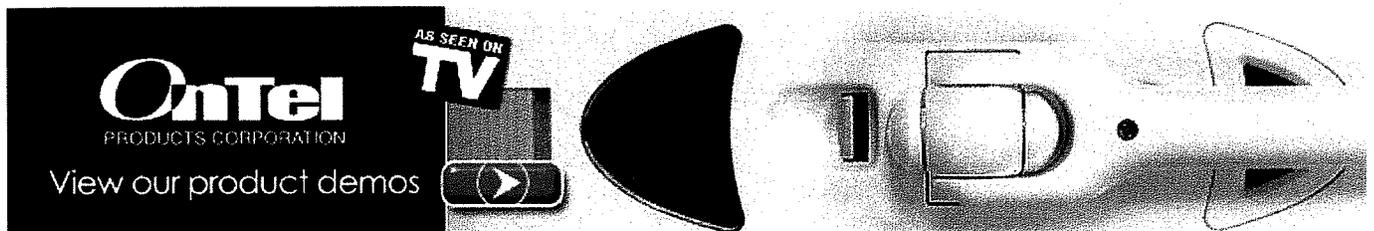
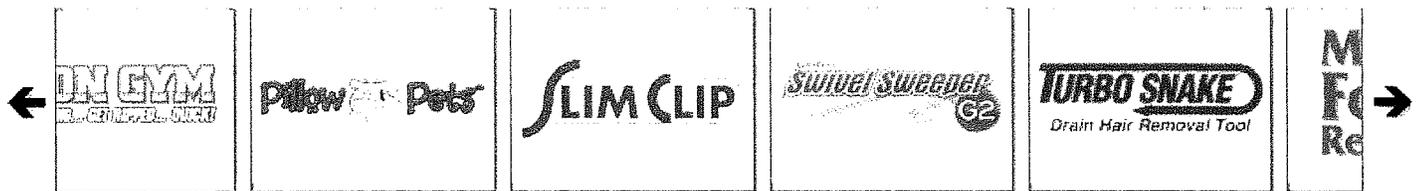
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Retail Partners

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Retail Partners

At Ontel Products we strive to provide the best service to our retail partners and continue to build the strong relationships we have with them. Through their support, we have been able to bring our products to consumers around the world for over 20 years. Today, you will find our products in nearly every major US retail store, including the ones listed below:



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

Opposition No.: 91197243

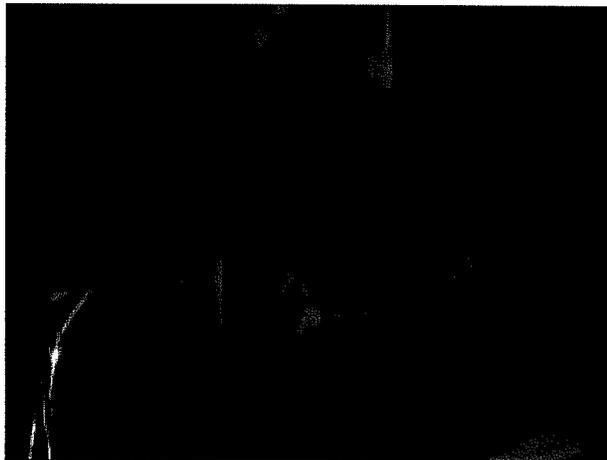
IOIP Holdings, LLC,)
)
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 v.)
)
Ontel Products Corporation,)
)
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Trademark Application Serial No. 77/648,190

OPPOSER'S NOTICE OF RELIANCE

DOCUMENTS REFERENCED IN

PARAGRAPH 23



Instant Stain Remover!

- Stop living with unsightly stains & throwing clothes out
- Instantly cleans stains on hands like magic
- Gentle on our skin & fabrics
- Out! is one tough cleaner
- **Works on**
 - Clothing
 - Carpets
 - Upholster
 - Car Seats
 - Leather
 - And More!

Out! Offer Includes

TRIPLE OFFER

- 1 Tube of Out!
- 1 Instant Stain Stick
- FREE Bonus** (Just Pay Additional P&H)
- 2nd Tube of Out! & Instant Stain Stick
- 3rd Tube of Out! & Instant Stain Stick

OUT! INSTANT STAIN REMOVER!

ORDER NOW

For Only **\$19.99** +S&H

TRIPLE OFFER

NOT AVAILABLE IN STORES



60 Day Money-Back Guarantee

Enter your billing information below.

You will also need to indicate if your shipping address is the same as your billing address. Then just click on the 'ORDER NOW' button when you are done.

- Select Offer **Out! Paste w/ Instant Stain Stick - Triple Offer**
 (just pay separate \$6.99 p&h)
 Out! Paste w/ Instant Stain Stick

Quantity 1 Limit 8

Credit Card --- Select Card --- *

Card Number *

Exp Date Month / Year *

Card Verification # * What is this?

First Name *

Last Name *

Bill Address *

Suite/Apt *

City *

State -- Select State -- *

Zip Code *

Country United States *

Phone Number *

Email *

[Privacy Policy](#)

Shipping and Billing Information are the same.

OUT! INSTANT STAIN REMOVER!

ORDER NOW

For Only **\$19.99** +S&H

TRIPLE OFFER

NOT AVAILABLE IN STORES

CLICK HERE

 **100% SECURE SERVER**

Offer Details: Use Out! on tough stains from food, oil, perspiration, grease, grass, ink, dirt, red wine, pets, even set in stains. Use Out! on hundreds of stains on clothing, carpeting, upholstery, leather, vinyl, metal, hands, and more. Use it on colorfast fabrics. As advertised, you'll get a tube of Out! and the Instant Stain Stick for just \$19.99 plus \$6.99 shipping and handling. As a bonus, we'll triple the offer and give you two more tubes of Out! and two Instant Stain Sticks for just an additional \$6.99 for processing and handling. 60 day money-back guarantee (less S/P&H).

SALES TAX: CA- 9.25%, NJ- 7%.

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