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

Proceeding	91199075
Party	Defendant Diageo North America, Inc.
Correspondence Address	LAUREN MANDELL DIAGEO 801 MAIN AVE NORWALK, CT 06851-1127 UNITED STATES trademarks@diageo.com
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Signature	/Evan Gourvitz/
Date	06/29/2011
Attachments	Initial Disclosures of Applicant Diageo NA 06292011.pdf (4 pages)(960217 bytes)

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

In the Matter of Application Serial No. 85/183,731
Published in the Official Gazette on February 22, 2011
Mark: BLUETAIL
International Class: 33

CASELLA WINES PTY LTD.,

Opposer,

-against-

DIAGEO NORTH AMERICA, INC.,

Applicant.

Opposition No. 91199075

INITIAL DISCLOSURES OF APPLICANT DIAGEO NORTH AMERICA, INC.

Pursuant to Trademark Rule 2.120(a)(2) and the Board's March 21, 2011 Order in this action, Applicant Diageo North America, Inc. ("Applicant") hereby provides its initial disclosures in this opposition.

I. Individuals likely to have discoverable information

1. Scott Schilling
Director, Innovation
Diageo North America, Inc.

Subjects of information: Applicant, its business, and the application at issue; the selection of the BLUETAIL mark ("Applicant's Mark"); Applicant's intended use of Applicant's Mark; the products intended to be sold bearing or in connection with Applicant's Mark; the intended advertising, promotion, marketing, and sale of products bearing or sold in connection with Applicant's Mark; the matters set forth in Applicant's answer in this action.

2. Jesse Damashek
Senior Manager, Innovation
Diageo North America, Inc.

Subjects of information: Applicant, its business, and the application at issue; the selection of Applicant's Mark; Applicant's intended use of Applicant's Mark; the products intended to be sold bearing or in connection with Applicant's Mark; the intended advertising, promotion,

marketing, and sale of products bearing or sold in connection with Applicant's Mark; the matters set forth in Applicant's answer in this action.

The above may be contacted solely through counsel for Applicant at the address and telephone number noted below.

3. Owners, officers, employees, or agents of
Opposer Casella Wines Pty Ltd. ("Opposer")

Subjects of information: Opposer and its business; the purported fame and strength of Opposer's marks consisting of or including YELLOW TAIL (collectively, "Opposer's Mark"); Opposer's purported rights in Opposer's Mark and its enforcement of those rights; the advertising and promotion of Opposer's Mark and products sold bearing or in connection with Opposer's Mark; the marketing and sale of products sold bearing or in connection with Opposer's Mark; the registration and use of Opposer's Mark; the purported likelihood of confusion with and dilution of Opposer's Mark caused and likely to be caused by Applicant's Mark; the purported injury to Opposer caused and likely to be caused by Applicant's Mark; the claims and allegations set forth in Opposer's Notice of Opposition in this action; third party marks potentially relevant to this proceeding, and the registration and use of such marks.

II. Documents supporting claims or defenses

The following categories of documents are expected to be used to support Applicant's claims or defenses:

1. Documents concerning Applicant and its business.
2. Documents concerning the application at issue.
3. Documents concerning the selection of Applicant's Mark.
4. Documents concerning Applicant's intended use of Applicant's Mark.
5. Documents concerning the products intended to be sold bearing or in connection with Applicant's Mark.
6. Documents concerning the intended advertising, promotion, marketing, and sale of products bearing or sold in connection with Applicant's Mark.
7. Documents concerning third-party marks potentially relevant to this proceeding, and the registration and use of such marks.

All of the above are located at Diageo's offices at 801 Main Avenue, Norwalk CT 06851 or 530 Fifth Avenue, New York, NY 10036.

III. Computation of damages

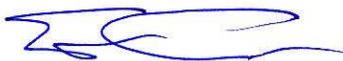
Not applicable.

IV. Insurance agreements

Not applicable.

Dated: Norwalk, Connecticut
June 29, 2010

Respectfully submitted,

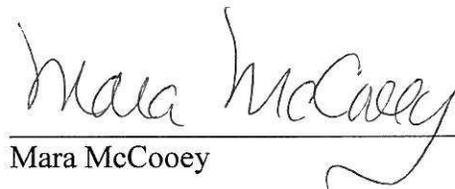


Evan Gourvitz
Diageo North America, Inc.
801 Main Avenue
Norwalk, Connecticut 06851
Phone: (203) 229-4265
Counsel for Opposer Diageo North America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing INITIAL DISCLOSURES OF OPPOSER DIAGEO NORTH AMERICA, INC. to be served, via first class mail, postage prepaid, on this 29th day of June 2011, to counsel for Opposer as follows:

Sean W. Dwyer
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103-6998


Mara McCooey