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

Proceeding	91200183
Party	Defendant Miss G-String International LLC
Correspondence Address	LUKE LIROT LUKE CHARLES LIROT PA 2240 BELLEAIR ROAD, SUITE 190 CLEARWATER, FL 33746 UNITED STATES luke2@lirotlaw.com, jimmy@lirotlaw.com, krista@lirotlaw.com
Submission	Response to Board Order/Inquiry
Filer's Name	Luke Lirot, Esq.
Filer's e-mail	luke2@lirotlaw.com, jimmy@lirotlaw.com, krista@lirotlaw.com
Signature	/s/Luke Lirot
Date	02/26/2015
Attachments	Applicants Pre-Trial Disclosures - as filed - 02-26-2015.pdf(94642 bytes)

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

THE WORLDS PAGEANTS, LLC and)	Opposition No. 91200183
Camilla Productions, Ltd.)	
Opposers,)	
)	
v.)	For: "MISS G-STRING
)	INTERNATIONAL"
)	
MISS G-STRING INTERNATIONAL LLC,)	No. 77753000
Applicant.)	Published: December 7, 2010

COMMISSIONER OF TRADEMARKS
UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

APPLICANT'S PRE-TRIAL DISCLOSURES

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, 37 C.F.R. § 2.121(e), and TTAB Chapter 702.01, the Applicant, Miss G-String International, LLC ("Applicant"), serves the following pre-trial disclosure of information that Applicant may use in support of its claims in this matter:

PRELIMINARY STATEMENT

The Applicant, Miss G-String International, LLC, provides the following disclosures based upon reasonable inquiry that Applicant may use to support its claims unless used solely for impeachment. This listing of a person herein does not constitute a concession by Applicant that the person in fact has relevant or discoverable information. Likewise, Applicant does not concede by

listing a particular document or document category that all or any of those documents are relevant to issues in the case, or that all or any are properly discoverable. Applicant hereby reserves all objections which otherwise would be available to Applicant concerning a document or the scope of inquiry to be had of the witness. In addition, Applicant does not waive, and hereby specifically reserve, all applicable privileges or work product protections, and reserve the right later to assert any appropriate objection to production of any disclosed witnesses or documents.

I.

Applicant may use the following individuals in support of its claims or defenses:

<u>Name and Address</u>	<u>Subject</u>
1. William Eadie c/o Law Office of Luke Lirot 2240 Belleair Road, Suite 190 Clearwater, Florida 33764 (727) 536-2100	Applicant's business policies, the specific characteristics of the business model, business interaction with entertainers and related matters.
2. Gracinda Cardoso 1473 Heather Way Kissimmee, FL 34744 Phone: (407) 846-7735 Home (954) 818-6465 Mobile	All matters related to Opposer's business model, business transactions, business ownership, Managing member/all matters related to Opposition, and related matters.
3. John Witges 1005 Mabbette Street Kissimmee, FL 34741 Phone: unknown	All matters related to Opposer's business model, business transactions, business ownership, Managing member/all matters related to Opposition, and related matters.
4. David Harrison 13418 N. Ocean Blvd., Suite 122 Ft. Lauderdale, FL 33308 Phone: unknown	All matters related to his role as assignor of the first Nunc Pro Tunc Trademarks Assignment Document and all matters related to his term as President of R&D Promotions, Inc., and related matters.
5. Craig J. Vogin, Notary Public c/o Philadelphia Mail Room	All matters related to being the Notary Public for both of the Opposer's Nunc Pro

8001 Castor Avenue
Philadelphia, Pennsylvania 19152
Phone: (215) 745-1100 Work

Tunc Assignment Documents

6. Patricia Hatry, Esquire
David & Gilbert, LLP
1740 Broadway
New York, New York 10019
Phone: (212) 468-4819 Work

Personal knowledge related to her deposition with Gracindo Cardoso as submitted into evidence by Opposer in Notice of Reliance and litigation history with Thomas Aquilla on behalf of various entities, and related matters.

7. Brian Bell
c/o Law Office of Luke Lirot
2240 Belleair Road, Suite 190
Clearwater, Florida 33764
(727) 536-2100

All matters related to R&D, Inc., Gracindo Cardoso, contract to borrow money and Pinellas County, Florida Judgment issued April 1, 2005, all matters relating to Opposer's pledging of "Miss Nude International," and sale of judgment to William Eadie, and related matters.

8. Thomas T. Aquilla, Esq.
Aquilla Patents & Marks, PLLC
221 Coe Hill Road
Center Harbor, NH 03226
Phone: (603) 253-9474 Work

All matters related to his May 13, 2009 letter Applicant's Counsel, second letter to New Hampshire Disciplinary Board, and his role in creating Nunc Pro Tunc Trademark Assignment Documents, and related matters.

Respectfully submitted,

By  _____

Signed: February 26, 2015

Luke Lirot, Esquire
Florida Bar Number 714836
LUKE CHARLES LIROT, P.A.
2240 Belleair Road, Suite 190
Clearwater, Florida 33746
Telephone: (727) 536-2100
Facsimile: (727) 536-2110
Attorney for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Applicant's Motion for Judgment has been served on Thomas T. Aquilla, Esq., as domestic representative of The Worlds Pageants, LLC, and Camilla Productions, Ltd., by mailing said copy on February 26, 2015, via First Class Mail, postage prepaid to: Thomas T. Aquilla, Esq., 221 Coe Hill Road, Center Harbor, New Hampshire 03226.



Luke Lirot, Esq.

Signed: February 26, 2015