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

Proceeding	91204124
Party	Plaintiff Threshold Enterprises, Ltd.
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Signature	/s/ Jeremy McLaughlin
Date	02/03/2014
Attachments	Declaration of Barry Sugarman In Support of Opposer's Opposition to Applicant's Motion for Summary Judgment .pdf(29530 bytes)

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

In the Matter of U.S. Application Serial No. 85/396136
For: PLANT HERBAL TREASURES

THRESHOLD ENTERPRISES LTD.,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91204124
)	
ROBERT CAMPBELL (individual),)	
)	
Applicant.)	
)	

**DECLARATION OF BARRY SUGARMAN IN SUPPORT OF OPPOSER'S
OPPOSITION TO APPLICANT'S MOTION FOR SUMMARY JUDGMENT**

I, Barry Sugarman, declare as follows:

1. I am the Consultant to the President of Opposer Threshold Enterprises, Ltd. ("Threshold"). I have worked with Threshold as Consultant to the President, a senior executive position since 1994. In this position, I am involved in a wide range of activities throughout Threshold, including, but not limited to, product development, sales, marketing, advertising, and business development. I have also served simultaneously as acting Quality Director during periods of time where Threshold was recruiting for that position. Another part of my job responsibilities include oversight of Threshold's trademark matters, including trademark litigation and the negotiation of coexistence agreements.

2. I am informed that Threshold has used the mark PLANETARY HERBALS as a housemark on herbal supplements since at least 2005.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. This declaration was executed on this 3rd day of February 2014, at Los Angeles, CA, California.



Barry Sugarman