

ESTTA Tracking number: **ESTTA590068**

Filing date: **02/28/2014**

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

Proceeding	91207808
Party	Plaintiff Patterson Enterprises DBA Suncare Distributors
Correspondence Address	THOMAS L HOLT STEPTOE & JOHNSON LLP 1330 CONNECTICUT AVENUE, NW WASHINGTON, DC 20036 UNITED STATES ipdocketing@steptoe.com, tholt@steptoe.com
Submission	Plaintiff's Notice of Taking Testimony
Filer's Name	Thomas L. Holt
Filer's e-mail	tholt@steptoe.com, ipdocketing@steptoe.com
Signature	/Thomas L. Holt/
Date	02/28/2014
Attachments	2014 02 27 Notice of Dep on Written Questions for Qichun Liang.pdf(26440 bytes )

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

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PATTERSON ENTERPRISES d/b/a	)	
SUNCARE DISTRIBUTORS,	)	
	)	Opposition No. 91207808
Opposer,	)	
	)	Serial No. 85/546,646
v.	)	
	)	Mark: HAF A ADAI
DENISE R. SELK d/b/a	)	
COCO-JO's.	)	Filing Date: February 18, 2012
	)	
Applicant.	)	<b>NOTICE OF DEPOSITION UPON</b>
	)	<b>WRITTEN QUESTIONS</b>
	)	

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To: Ms. Denise R. Selk  
Coco-Jo's  
149 Chalan Guefan  
Inarajan, GUAM 96915

PLEASE TAKE NOTICE that pursuant to Rules 31 of the Federal Rules of Civil Procedure and Rule 2.124 of the Trademark Rules of Practice (37 C.F.R. S 2.124), Opposer Suncare Distributors (“Opposer”), shall take the testimonial deposition upon written questions of Qichun (“Sophia”) Liang, President, Senocean Industrial Company, Ltd., Room 602, #258 Hexiang Road, West, Xiamen, China, (86) 592-8846, concerning Opposer’s use, adoption, and promotion of the HAF A ADAI mark in the United States and each of the matters covered in the related questions attached hereto as Exhibit A.

The deposition will take place before a person authorized to administer oaths at the offices of a location to be determined.

The questions to be propounded at the deposition upon written questions are set forth in Exhibit A, attached hereto.

You are invited to serve cross questions in accordance with the applicable rules.

FURTHERMORE, the official court reporter for this Deposition Upon Written Questions is hereby requested pursuant to Rule 30(f) of the Federal Rules of Civil Procedure as follows:

1. to certify on the deposition that the witness was duly sworn by the officer;
2. to certify that the deposition is a true record of the testimony given;
3. to make sure that the deposition and exhibits are securely sealed and mailed by

DHL courier or other express courier to:

Thomas L. Holt  
Step toe & Johnson LLP  
115 South LaSalle Street, Suite 3100  
Chicago, Illinois 60603  
United States of America

Respectfully submitted,

Dated: February 28, 2014

By: /s/ Thomas L. Holt  
Thomas L. Holt  
STEP TOE & JOHNSON LLP  
115 South LaSalle Street  
Suite 3100  
Chicago, IL 60603  
Telephone: (312) 577-1300  
Facsimile: (312) 577-1370

Attorneys for Opposer

**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2014 I served a true and correct copy of the foregoing OPPOSER'S NOTICE OF DEPOSITION UPON WRITTEN QUESTIONS

Applicant by U.S. mail at the following address:

Ms. Denise R. Selk  
Coco-Jo's  
149 Chalan Guefan  
Inarajan, GUAM 96915

/s/ Thomas L. Holt  
One of the Attorneys for Opposer  
Patterson Enterprises d/b/a  
Suncare Distributors