

ESTTA Tracking number: **ESTTA687047**

Filing date: **07/31/2015**

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 PERKINS COIE LLP 131 South Dearborn Street Suite 1700 Chicago, IL 60603 UNITED STATES tholt@perkinscoie.com, pctrademarks@perkinscoie.com
Submission	Plaintiff's Notice of Taking Testimony
Filer's Name	Thomas L. Holt
Filer's e-mail	tholt@perkinscoie.com, pctrademarks@perkinscoie.com
Signature	/Thomas L. Holt/
Date	07/31/2015
Attachments	Ymesi - Testimony Notice.pdf(10507 bytes) Tenorio - Testimony Notice.pdf(9774 bytes)

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

PATTERSON ENTERPRISES d/b/a)	
SUNCARE DISTRIBUTORS,)	
)	Opposition No. 91207808
Opposer,)	
)	Serial No. 85/546,646
v.)	
)	Mark: HAFA ADAI
DENISE R. SELK d/b/a)	
COCO-JO's,)	Filing Date: February 18, 2012
)	
Applicant.)	

**NOTICE OF DEPOSITION UPON WRITTEN QUESTIONS
OF WILLIAM YMESEI**

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. §2.124), Opposer Suncare Distributors (“Opposer”), shall take the testimonial deposition upon written questions of William Ymesei, Patterson Enterprises d/b/a Suncare Distributors, 1122 Route 16, Barrigada, Guam 96913, concerning Opposer’s adoption, use and promotion of the HAFA 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
PERKINS COIE LLP
131 South Dearborn Street
Suite 1700
Chicago, Illinois 60603
United States of America

Respectfully submitted,

Dated: July 31, 2015

By: /s/ Thomas L. Holt
Thomas L. Holt
PERKINS COIE LLP
131 South Dearborn Street
Suite 1700
Chicago, Illinois 60603
Telephone: (312) 384-8400
Facsimile: (312) 384-9400

Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2015 I served a true and correct copy of the foregoing
OPPOSER'S NOTICE OF DEPOSITION UPON WRITTEN QUESTIONS OF WILLIAM
YMESEI Applicant by U.S. mail at the following address:

DENISE R SELK DBA COCO-JO'S
PO BOX 2676
HAGATNA, GU 96932

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

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

PATTERSON ENTERPRISES d/b/a)	
SUNCARE DISTRIBUTORS,)	
)	Opposition No. 91207808
Opposer,)	
)	Serial No. 85/546,646
v.)	
)	Mark: HAFA ADAI
DENISE R. SELK d/b/a)	
COCO-JO's,)	Filing Date: February 18, 2012
)	
Applicant.)	

**NOTICE OF DEPOSITION UPON WRITTEN QUESTIONS
OF PATRICIA TENORIO**

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. § 2.124), Opposer Suncare Distributors (“Opposer”), shall take the testimonial deposition upon written questions of Patricia Tenorio, Kmart, 404 N Marine Corps Dr. (Rte. 1), Tamuning, GU 96913, concerning Opposer’s adoption, use and promotion of the HAFA 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:

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Thomas L. Holt
PERKINS COIE LLP
131 South Dearborn Street
Suite 1700
Chicago, Illinois 60603
United States of America

Respectfully submitted,

Dated: July 31, 2015

By: /s/ Thomas L. Holt
Thomas L. Holt
PERKINS COIE LLP
131 South Dearborn Street
Suite 1700
Chicago, Illinois 60603
Telephone: (312) 384-8400
Facsimile: (312) 384-9400

Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2015 I served a true and correct copy of the foregoing
OPPOSER'S NOTICE OF DEPOSITION UPON WRITTEN QUESTIONS OF PATRICIA
TENORIO Applicant by U.S. mail at the following address:

DENISE R SELK DBA COCO-JO'S
PO BOX 2676
HAGATNA, GU 96932

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