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

Proceeding	91210282
Party	Plaintiff Red Bull GmbH
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Submission	Motion to Compel Discovery
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Signature	/Leah Z. Halpert/
Date	03/25/2015
Attachments	Stockmarket Burger-Consolidated Oppo 91210282-Mtn to Compel.pdf(1020423 bytes )



## **I. STATEMENT OF RELEVANT FACTS**

Opposer properly served the Document Requests via first class mail on May 23, 2014. (Halpert Decl. ¶ 4, Exh. A.) These requests pertained to both of the opposed applications in this consolidated matter at the time: Application Nos. 85/680,816 (“the ‘816 Appln.”) and 85/969,820 (“the ‘820 Appln.”). In accordance with Fed. R. Civ. P. 33(b)(2), 34(b)(2)(A), and 36(a)(3), Applicant’s responses to the Document Requests were all due by June 27, 2014.<sup>1</sup>

Rather than respond to the discovery requests as required, however, Applicant filed a Motion for Partial Judgment on the Pleadings late in the evening of June 26, 2014 – one day before the discovery deadline. (Mot. for J. on Pleadings, Docket No. 18, Jun. 26, 2014.) An order suspending the instant matter was issued on July 25, 2014 (Bd. Order, Docket No. 20, Jul. 25, 2014), with the suspension relating back to June 26, 2014. (*Id.*); *see Leeds Technology Ltd. v. Topaz Communications Ltd.*, 65 USPQ2d 1303, 1305-06 (TTAB 2002); TBMP § 510.03(a).

Despite the suspension, on December 24, 2014 Applicant served on Opposer “responses” to Opposer’s Interrogatories and RFP. (Halpert Decl. ¶ 6.) These responses were wholly devoid of any actual disclosures and instead consisted exclusively of the following exact same improper boilerplate objections copied and pasted in response to every Interrogatory and RFP request:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant’s right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The

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<sup>1</sup> Responses to interrogatories, requests for production, and requests for admission must be served within 30 days after the date of service of the requests, unless otherwise stipulated by the parties or ordered by the Board. If service of the requests is made by first-class mail, “Express Mail”, or overnight courier, the date of mailing or of delivery to the overnight courier is considered to be the date of service, and five extra days are allowed for responding to the requests. TBMP §§ 405.04(a), 406.04(a), 407.03(a).

motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

(Halpert Decl. ¶6, Exh. B.) On January 7, 2015, Applicant served its "responses" to Opposer's RFA, again consisting solely of the same long paragraph of objections seen in response to the Interrogatories and RFP, but writing it only one time as a general objection to each and every one of the 1193 requests for admission. (*Id.*)

On January 28, 2015, the Board issued an order denying Applicant's Motion for Partial Judgment on the Pleadings in the consolidated opposition<sup>2</sup> and resuming the proceedings. (Bd. Order Den. Mot. For J. on Pleadings, Docket No. 24, Jan. 28, 2015.) Within the January 28 Order, the Board resumed the proceedings and specifically granted the parties thirty days from the mailing date set forth in the order (or until February 27, 2015) to serve responses to any outstanding discovery requests that were served prior to filing of the Motion for Partial Judgment on the Pleadings in the opposition proceedings. (*Id.*) Having already received "responses" from Applicant, on January 29, 2015 Leah Z. Halpert, Counsel for Opposer contacted Paulo A. de Almeida, Counsel for Applicant via email requesting a meet and confer conference to discuss the deficiencies of the responses. (Halpert Decl. ¶ 7, Exh. C.) This email went unanswered. (*Id.*) On February 2, 2015, Ms. Halpert sent a follow-up email to Mr. de Almeida regarding the previously requested meet and confer conference, again receiving no reply. (*Id.* ¶ 8, Exh. C.) Having been unsuccessful at reaching Mr. de Almeida via email, on February 5, 2015, Ms. Halpert attempted to contact Mr. de Almeida via telephone, only to be told by Mr. de Almeida's secretary, Rachel, that he was on the phone and would return the phone call as soon as possible. (*Id.* ¶ 9.) To date, none of the emails or the phone call have been returned by Mr. de Almeida, and Opposer has not received any supplemental discovery responses from Applicant. (*Id.* ¶ 10.)

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<sup>2</sup> Within the same order, the Board also denied Applicant's Motion for Partial Judgment on the Pleadings in the related Cancellation No. 92-059,220 and admonished Applicant for filing the baseless motions. (*See* Bd. Order Den. Mot. For J. on Pleadings, Docket No. 24, Jan. 28, 2015.)

Counsel for Opposer has attempted in good faith to resolve this discovery dispute via written and telephonic correspondence and has, to date, received no response from Applicant. (Halpert Decl. ¶¶ 10, 11, Exh. C.). Due to this complete lack of response on the part of Applicant, the parties are unable to resolve this matter, necessitating the instant motion.

## II. ARGUMENT

### A. Applicant's "Responses" to Opposer's Discovery Requests Amount to Nothing More Than Improper General Objections.

Objections to discovery requests must be specific to the requests for which the objections are being interposed, else such objections are waived. That is, in addition to stating the objection, the objecting party must explain the grounds for the specific objection and to which part the objection applies in the specific discovery request at issue. *See* 8B Wright, Miller, Kane and Marcus, *Fed. Prac. & Proc. Civ. 3d* § 2213 (Westlaw update 2013); *See IO Group, Inc. v. Veoh Networks, Inc.*, 2007 U.S. Dist. LEXIS 31639 (N.D. Cal., Apr. 13, 2007) (general objections purportedly incorporated into specific responses overruled as improper boilerplate objections as they obscure the extent to which information is withheld and do not satisfy the specificity requirement under Fed. R. Civ. P. 34(b)). Here, while Applicant's objections are not "boilerplate" in the sense of containing only generalized objections of a sort that might be found in any case, Applicant repeats the exact same long paragraph of objections and "explanations" in response to each and every request for admission, request for production, and interrogatory, regardless of the applicability of the recitation to the particular request. Just as seen with improper general objections, Opposer is left guessing how the objections relate to the specific requests and cannot determine what is being withheld based on the objections.

Applicant's "responses" to the RFA show even more clearly that these objections amount to nothing more than boilerplate general objections. Here, Applicant does not even bother to repeat the identical objections to each and every one of Opposer's 1193 RFA, but rather

generally applies the non-responsive objections to each and every request with the following preface:

Applicant specifically objects to each and every request for admission, nos. 1 – 1193, on the following grounds

(Halpert Decl., Exh. B). Simply because Applicant used the term “specifically” does not save this from being an improper general objection in violation of Fed. R. Civ. P. 34(b)’s specificity requirement, leaving Applicant’s RFA responses lacking any merit.

Given the improper general nature of each and every one of Applicant’s discovery “responses”, Opposer respectfully requests that Applicant’s meritless objections be overruled, that Applicant be compelled to provide a complete production to Opposer’s discovery requests without objection, and that Opposer’s RFA be deemed ADMITTED.

**B. Applicant’s Objection on the Ground that Each and Every Discovery Request is “Overbroad, Unduly Burdensome, and does not Specify with Reasonable Particularity the Information or Documents to be Produced and Seeks Information which is Irrelevant and not Reasonably Calculated to Lead to the Discovery of Admissible Evidence” is Improper and not Considered a Response.**

Even assuming that Applicant’s repeated paragraph of objections is not “general”, but is, instead, “specific” to the requests to which they pertain, the three repeated objections are still improper and not considered responsive. First, Applicant makes the following objection to each and every Document Request:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because it seeks information pertaining to facts which Applicant has already admitted and is therefore cumulative and/or Opposer could not possibly gain any benefit from the information and/or the benefit to be gained is vastly outweighed by the burden and expense of production by Applicant.

(Halpert Decl., Exh. B.) Applicant does not, in any way, specify how any of the particular requests are “overbroad”, “non-specific”, or “not reasonably calculated to lead to the discovery

of admissible evidence”, and Opposer and the Board are left unsure of Applicant’s perceived specific deficiency with each of Discovery Requests. Further, although Applicant seemingly specifies its “unduly burdensome” objection, it again fails to inform Opposer of any actual details – what facts have been admitted and what part of the request pertains to such facts? Again, Opposer and the Board are left in the dark as to the reason why and the number of documents being withheld due to Applicant’s unfounded objection.

This boilerplate objection is also completely nonsensical in regard to the RFA, since requests for admission only require a simple “admit”, “deny”, or explanation of why the responding party cannot truthfully admit or deny the requests. No documents are gathered and “produced” in response to RFAs, and in no way can providing such a simple response, and in no way can providing such a simple response be deemed “burdensome”. Such an objection is clearly frivolous and meritless, and should with overruled.

**C. Applicant’s Objection on the Ground that the Request Seeks Confidential and/or Trade Secret Information is Improper and not Considered a Response.**

Applicant also makes the following objection to each and every request:

Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant’s right of privacy under California or federal law.

(*Id.*) However, in inter partes proceedings before the Trademark Trial and Appeal Board, the Board’s standard protective order is automatically in effect unless the parties agree to or move for a different one. *See* 37 C.F.R. § 2.116(g)<sup>3</sup>; TBMP § 412.01. As such, it is improper for parties to withhold properly discoverable information on the basis of confidentiality, *see e.g.*, *Amazon Technologies, Inc. v. Wax*, 93 USPQ2d 1702, 1706 n.6 (TTAB 2009); TBMP § 412.01,

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<sup>3</sup> “The Trademark Trial and Appeal Board’s standard protective order is applicable during disclosure, discovery and at trial in all opposition, cancellation, interference and concurrent use registration proceedings, unless the parties, by stipulation approved by the Board, agree to an alternative order, or a motion by a party to use an alternative order is granted by the Board.

and the Board can compel the non-complying party to provide such information consistent with the terms of the protective order. 37 C.F.R. § 2.120(g); TBMP 412.01.

Here, Applicant relies on the general objection of “confidentiality” for each and every “response” to the Discovery Requests in order to improperly withhold an unspecified amount of information. Additionally, as with the rest of the improper objections, Applicant does not inform Opposer (or the Board) as to which specific portion of the particular requests it believes seeks such confidential information that it is withholding. As Opposer and the Board cannot guess why this particular objection may apply to each and every of the requests, and Applicant does not provide any responsive non-confidential information, it is an improper, inadequate objection.

**D. Applicant’s Objection on the Ground that a Motion for Judgment on the Pleadings Pending in this Case is Pending is Moot and not Considered a Response.**

Finally, Applicant objects to each and every request with the following:

Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions [sic] are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board’s decision on the motion.

(Halpert Decl., Exh. B.) Although this may have been a viable, although superfluous, objection at the time it was made (while the Motion for Partial Judgment on the Pleadings was pending), Applicant’s continued reliance on it is wholly unfounded and improper in light of the Board’s January 28, 2015 Order denying the Motion for Partial Judgment on the Pleadings in full and resuming the proceedings. This objection is now unsupported and entirely meritless, and should be overruled.

### III. CONCLUSION

For the foregoing reasons, Opposer moves (1) to have all of Applicant's frivolous and meritless objections overruled, (2) to compel complete production to Opposer's discovery requests without objection, and (3) to have Opposer's RFA deemed ADMITTED due to Applicant's lack of a proper, timely response.

Date: March 25, 2015

Respectfully submitted,  
RED BULL GMBH  
By: /Leah Z. Halpert/  
Leah Z. Halpert  
Martin R. Greenstein  
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Attorneys for Opposer

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **OPPOSER'S MOTION TO COMPEL AND MOTION TO TEST THE SUFFICIENCY OF RESPONSE** is being served on March 25, 2015, by first class mail, postage prepaid on Applicant's Correspondent of Record at the Correspondent's address of record below, with courtesy copy via email to [Paulo@patelalmeida.com](mailto:Paulo@patelalmeida.com):

Paulo A. de Almeida  
Patel & Almeida, P.C.  
16830 Ventura Blvd, Suite 360  
Encino, CA 91436

/Leah Z. Halpert/  
Leah Z. Halpert

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

<b>RED BULL GMBH,</b>	)	<b>Consolidated Matter: 91-210,282</b>
	)	Opposition No.: 91-210,282 (Parent)
<b>Opposer,</b>	)	Opposition No.: 91-214,537 (Child)
	)	<b>Marks:</b>
v.	)	<b>Bull and Swirl Design (#85/680,816)</b>
	)	<b>STOCKMARKET &amp; Bull Design</b>
<b>STOCKMARKET BURGER, INC.,</b>	)	(#85/969,820)
	)	<b>Serial Nos.:</b>
<b>Applicant.</b>	)	<b>85/680,816</b>
	)	<b>85/969,820</b>

**DECLARATION OF LEAH Z. HALPERT IN SUPPORT OF OPPOSER’S MOTION TO COMPEL AND MOTION TO TEST THE SUFFICIENCY OF RESPONSES**

I, Leah Z. Halpert, hereby declare under penalty of perjury of the laws of the United States of America, that the following is true and correct:

1. I am an attorney in good standing with the bar of the State of California, am an associate at TechMark a Law Corporation (“TechMark”), and am one of the counsel of record for Opposer, Red Bull GmbH (“Opposer”), in the above-captioned proceeding.
2. I am familiar with the facts and circumstances stated herein based on my personal knowledge, and, if called as a witness, could and would testify competently to such facts under oath.
3. I submit this declaration in support of Opposer’s to Compel and Motion to Test the Sufficiency of Responses.
4. On May 23, 2014, Opposer served Opposer’s First Set of Interrogatories to Applicant (“Interrogatories”), Opposer’s First Set of Requests for Production of Documents and Things to Applicant (“Requests for Production”), and Opposer’s First Set of Request for Admission to Applicant (“Requests for Admission”) (hereinafter collectively referred to

as “Opposer’s Discovery Requests”) on Stockmarket Burger, Inc. (“Applicant”) via first class mail. The discovery requests pertain to both of the opposed applications in this case -- #85/680,816 (“the ‘816 Appln.”) and #85/969,820 (“the ‘820 Appln.”). A true and correct copy of Opposer’s Discovery Requests is attached hereto as Exhibit A.

5. Late in the evening of June 26, 2014, Applicant filed a Motion for Partial Judgment on the Pleadings (“MPJP.”), which suspended the matter pending disposition of the MPJP.
6. While the proceeding was still suspended, Applicant served on Opposer Applicant’s Responses to Opposer’s Interrogatories and Applicant’s Responses to Opposer’s Request for Production of Documents and Things on December 24, 2015 and Applicant’s Responses to Opposer’s Requests for Admission on January 7, 2015. A true and correct copy of all of Applicant’s discovery responses is attached hereto as Exhibit B.
7. Following the issuance of the January 28, 2015 Board Order resuming the proceeding, on January 29, 2015, Counsel for Opposer emailed Counsel for Applicant, requesting a meet and confer conference to discuss Applicant’s discovery responses. The January 29, 2015 email went unanswered.
8. Counsel for Opposer sent a subsequent email to Counsel for Applicant on February 2, 2015 regarding setting up a meet and confer conference, and again received no reply. A true and correct copy of the January 29, 2015 and February 2, 2015 emails is attached hereto as Exhibit C.
9. On February 5, 2015, Counsel for Opposer telephoned Counsel for Applicant in a continued effort to set up a meet and confer conference. Counsel for Opposer was only able to speak with “Rachel” who stated that Counsel for Applicant was on the phone and would return Counsel for Opposer’s telephone call as soon as possible.

10. To date, Counsel for Opposer has not received any response whatsoever from Counsel for Applicant, and Opposer has not received any supplemental discovery responses.
11. Counsel for Opposer certifies that it has made a good faith effort to resolve with Counsel for Applicant the issues presented in the instant motion, and has been unable to reach agreement due to the complete lack of response and unwillingness to cooperate from Counsel for Applicant.

Executed this 25<sup>th</sup> day of March 2015 at San Jose, CA.

/Leah Z. Halpert/  
Leah Z. Halpert

# Exhibit A



foregoing entities or individuals, including but not limited to attorneys, consultants, experts, investigators, agents, or other persons acting on behalf of or in concert with Applicant.

2. “Person” means any natural person and any governmental unit or agency, corporation, partnership, firm, joint venture, sole proprietorship or other legal or business entity of any kind.

3. To “identify” or “state” the identity of a person, if that person is a natural person, means to state:

- (a) His or her name and all other names by which he or she is referred;
- (b) His or her present or last known residence address and telephone number;
- (c) His or her present or last known business or occupational address and telephone number;
- (d) His or her present or last known occupation, position, and business or governmental affiliation;
- (e) Whether he or she has ever been employed or engaged by you, and, if so, the dates of employment or engagement and a brief description of his or her job titles, capacities, and responsibilities during the time of such employment or engagement.

4. To “identify” or “state” the identity of a person, if that person is not a natural person, means to:

- (a) State its full name and specify its nature (e.g., corporation, partnership, governmental entity, etc.);
- (b) State its present or last known principal address;
- (c) If it is a corporation, set forth the state of its incorporation, and identify the principal officers of said corporation;

- (d) If it is a partnership, state whether it is a general or limited partnership, and identify each general or limited partner;
- (e) In the case of any other business or governmental entity, identify each owner and/or director.

5. "Document" means the original and any non-identical copy (which is different from the original or any copy because of notations thereon or attached thereto or otherwise) of any written, printed, typewritten, handwritten or recorded matter however produced, reproduced or recorded, including without limitation, computer software, disks and disk labels, user guides and other manuals and documentation shipped with computer software, packaging, letters, correspondence, telegrams, electronic mail, instant messages, SMS or other text message communications, any other form of communications, reports, studies, diaries, minutes, maps, time sheets or logs, computer data, pamphlets, advertisements, circulars, trade letters, press releases, articles, notes, charts, calendars, tabulations, workbooks, analyses, bank records, income tax records, ledgers, books of account, statistical information accumulations, records of meetings and conversations of any kind, drafts and revisions of drafts of documents, drafts of articles or advertisements written for others for use in creation of any papers, documents, articles or promotional materials for Applicant, film impressions, photographs, magnetic tape, disks, sound or mechanical reproductions, recordings, receipts, contracts, agreements, purchase orders, purchase order acknowledgments, invoices, advertisements, receipts, drawings, vouchers, charge slips, freight bills, annual reports and telephone records, which is or was at any time in your possession, custody or control or known or believed by you to exist or to have existed. Without limitation, as used in this definition, a document is deemed to be or to have been in your "control" if you have or had the right to secure the document or a copy thereof from another person or governmental entity, including without limitation attorneys, having actual physical

possession thereof.

6. To “identify” or “state the identity of” a document means to state with respect thereto:

- (a) The nature or type of the document (e.g., letter, contract, etc.) and any official identifying number such as a serial no., registration no., filing no. or other unique identification marking(s) and the agency or entity which applied or assigned such marking(s);
- (b) Its date, and if it bears no date, the date when it was prepared;
- (c) The identity of its author, each signatory or person over whose name it is issued, and each person who received, approved or commented on it;
- (d) The identity of all persons to whom the document was addressed or distributed;
- (e) The last known physical location and address of the original and each copy, and the identity of its custodian(s);
- (f) The general subject matter or content of the document with sufficient particularity to enable it to be identified;
- (g) If the document was, but is no longer, in your possession or subject to your control (e.g., because it has been lost, destroyed, transmitted to another person, etc.), state what disposition was made of it, the date of such disposition, and the reasons for such disposition;

7. “Oral communication” means any meeting, conference, verbal exchange, comment or statement for which one or more persons were within hearing, including communication by telephone or other means of oral communication.

8. To “identify” an oral communication means to:

- (a) Identify each person who participated in or was present at the communication;

- (b) State the date and place of the communication;
- (c) Set forth the substance of what was said by each person speaking at or during the communication;
- (d) State the means or medium through which the communication was made (e.g., in person, telephone, cellular telephone, SMS or text message, other messaging system, etc.);
- (e) Identify each person or entity represented or purportedly represented by the persons participating in or present at the communication;
- (f) Identify each document relating to, concerning, referring to, or purporting to summarize or set forth all or any part of the communication.

9. The terms “trademark,” “service mark,” and “mark” each include trademarks, service marks, trade names, corporate names and use of terms analogous to use as a trademark or service mark (and include use of a word or symbol alone or in combination with other words or symbols).

10. The terms “concern” or “concerning” as used in these requests include communications, documents, or meetings, of any kind, that bear upon, describe, discuss, evidence, mention, pertain, refer, reflect, or relate, directly or indirectly, to the stated topic. Documents may have been created, dispatched, distributed, filed or maintained so as to be contemporaneous, responsive, contiguous, attached, incorporated or to cover relevant documents, and are as such within the scope of these discovery requests. With respect to any document requested below for which a claim of privilege, work product or confidentiality is made, specify (in log form) the nature of the document, identify by name, address, title and business affiliation, the writer, the addressee and all recipients thereof, and set forth the general subject matter to which the document relates, and its date.

11. Use “on or in connection with” a product or service as used herein means use as a trademark in a manner sufficient to satisfy the use and maintenance requirements for registration of a mark under the Lanham Act.

12. As used herein, “Applicant’s ‘816 Mark” shall mean, and include, the mark Bull Device of Appln. No. 85/680,816, shown below, alone, together, or in combination with any other words, symbols, graphics or designs as a trademark, service mark, trade name, corporate name or otherwise.



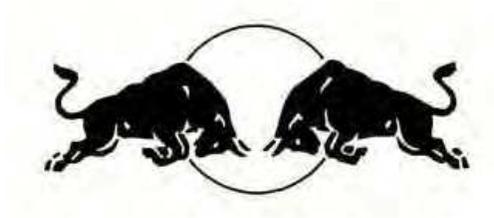
**Applicant’s ‘816 Mark**

13. As used herein, “Applicant’s ‘820 Mark” shall mean, and include, the mark and STOCKMARKET & Bull Device of Appln. No. 85/969,820, shown below, alone, together, or in combination with any other words, symbols, graphics, or designs as a trademark, service mark, trade name, corporate name or otherwise.



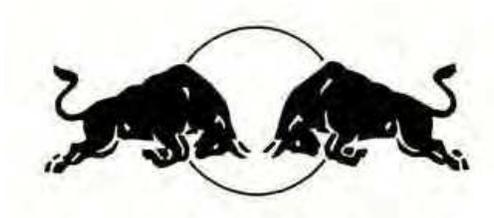
**Applicant’s ‘820 Mark**

14. As used herein, “Red Bull’s ‘045 Mark” shall mean the mark of U.S. Trademark Registration No. 2,946,045, as seen below.



**Red Bull's '045 Mark**

15. As used herein, "Red Bull's '994 Mark" shall mean the mark of U.S. Trademark Registration No. 3,051,994, as seen below.



**Red Bull's '994 Mark**

16. As used herein, "Red Bull's '283 Mark" shall mean the mark of U.S. Trademark Registration No. 3,561,283, as seen below.

**Red Bull**



**Red Bull's '283 Mark**

17. As used herein, "Red Bull's '959 Mark" shall mean the mark of U.S. Trademark Registration No. 4,031,959, as seen below.



**Red Bull's '959 Mark**

18. As used herein, Red Bull's "RED BULL and Bull Logo Marks" shall mean and include the marks subject to Red Bull's common law rights, namely, RED BULL, RED BULL & Two Bulls Logo, Two Bulls Logo, (Single) Bull Logo, and other marks incorporating the word BULL and/or the design of a bull or bovine animal.

Applicant shall separately identify the interrogatory by number pursuant to which each answer is given. A written, signed response to this request under oath or declaration is required pursuant to Fed. R. Civ. P. 34.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1:**

Identify all individuals who have knowledge about the intended use, marketing, advertising and/or promotion of Applicant's '816 Mark and Applicant's '820 Mark on the goods and services set forth in their respective application.

#### **INTERROGATORY NO. 2:**

Explain the process through which Applicant conceived, cleared and adopted Applicant's '816 Mark and Applicant's '820 Mark in connection with the goods and services set forth in their respective applications, and identify the person(s) involved with or knowledgeable about this process.

#### **INTERROGATORY NO. 3:**

Explain in detail each and every product and service intended to be offered or marketing by Applicant under Applicant's '816 Mark and Applicant's '820 Mark.

#### **INTERROGATORY NO. 4:**

Explain how Applicant's '816 Mark and Applicant's 820 Mark are intended to be used in connection with each of the goods and services identified in their respective applications.

#### **INTERROGATORY NO. 5:**

Identify the intended target consumers market for each product or service marketed, advertised, promoted, offered for sale and/or sold/rendered under Applicant's '816 Mark and Applicant's '820 Mark.

INTERROGATORY NO. 6:

Describe in detail the manner in which the products and services identified in the applications for Applicant's '816 Mark and Applicant's '820 Mark are intended to be distributed/rendered to the ultimate consumers.

INTERROGATORY NO. 7:

Explain the origin of Applicant's '816 Mark and Applicant's '820 Mark, including why the design of a bull was chosen.

INTERROGATORY NO. 8:

Explain the color in which Applicant's '816 Mark and Applicant's '820 Mark are intended to be, or are used, and explain how the color was chosen.

INTERROGATORY NO. 9:

Identify any other trademarks Applicant considered adopting in connection with any of the products and services set forth in U.S. Application No. 85/680,816, and explain why Applicant's '816 Mark was chosen.

INTERROGATORY NO. 10:

Identify any other trademarks Applicant considered adopting in connection with any of the products and services set forth in U.S. Application No. 85/969,820, and explain why Applicant's '820 Mark was chosen.

INTERROGATORY NO. 11:

Describe all efforts, plans, and actions taken by Applicant to begin use of Applicant's '816 Mark.

INTERROGATORY NO. 12:

Describe all efforts, plans, and actions taken by Applicant to begin use of Applicant's '820 Mark.

INTERROGATORY NO. 13:

Describe all negotiations and agreements relating to steps taken in preparation for the intended use of Applicant's '816 Mark, including but not limited to those relating to or involving contracts for goods or services, license agreements, proposals, bids, or any other discussion relating to the intended use of Applicant's '816 Mark.

INTERROGATORY NO. 14:

Describe all negotiations and agreements relating to steps taken in preparation for the intended use of Applicant's '820 Mark, including but not limited to those relating to or involving contracts for goods or services, license agreements, proposals, bids, or any other discussion relating to the intended use of Applicant's '820 Mark.

INTERROGATORY NO. 15:

Describe Applicant's document retention policy, including steps Applicant has taken to preserve the documents that may be relevant to this proceeding.

Respectfully submitted,

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By: /Martin R. Greenstein/  
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E-Mail: MRG@TechMark.com  
Attorneys for Opposer

Dated: May 23, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **OPPOSER'S FIRST SET OF INTERROGATORIES TO APPLICANT** is being served on May 23, 2014, by first class mail, postage prepaid on Applicant's Correspondent of Record at the Correspondent's address of record below:

Paulo A. de Almeida  
Patel & Almeida, P.C.  
16830 Ventura Blvd, Suite 360  
Encino, CA 91436

/Leah Z. Halpert/  
Leah Z. Halpert



interest, including successors and assigns, and all persons employed by any and all of the foregoing entities or individuals, including but not limited to attorneys, consultants, experts, investigators, agents, or other persons acting on behalf of or in concert with Applicant.

2. “Person” means any natural person and any governmental unit or agency, corporation, partnership, firm, joint venture, sole proprietorship or other legal or business entity of any kind.

3. To “identify” or “state” the identity of a person, if that person is a natural person, means to state:

- (a) His or her name and all other names by which he or she is referred;
- (b) His or her present or last known residence address and telephone number;
- (c) His or her present or last known business or occupational address and telephone number;
- (d) His or her present or last known occupation, position, and business or governmental affiliation;
- (e) Whether he or she has ever been employed or engaged by you, and, if so, the dates of employment or engagement and a brief description of his or her job titles, capacities, and responsibilities during the time of such employment or engagement.

4. To “identify” or “state” the identity of a person, if that person is not a natural person, means to:

- (a) State its full name and specify its nature (e.g., corporation, partnership, governmental entity, etc.);
- (b) State its present or last known principal address;
- (c) If it is a corporation, set forth the state of its incorporation, and identify the

principal officers of said corporation;

- (d) If it is a partnership, state whether it is a general or limited partnership, and identify each general or limited partner;
- (e) In the case of any other business or governmental entity, identify each owner and/or director.

5. "Document" means the original and any non-identical copy (which is different from the original or any copy because of notations thereon or attached thereto or otherwise) of any written, printed, typewritten, handwritten or recorded matter however produced, reproduced or recorded, including without limitation, computer software, disks and disk labels, user guides and other manuals and documentation shipped with computer software, packaging, letters, correspondence, telegrams, electronic mail, instant messages, SMS or other text message communications, any other form of communications, reports, studies, diaries, minutes, maps, time sheets or logs, computer data, pamphlets, advertisements, circulars, trade letters, press releases, articles, notes, charts, calendars, tabulations, workbooks, analyses, bank records, income tax records, ledgers, books of account, statistical information accumulations, records of meetings and conversations of any kind, drafts and revisions of drafts of documents, drafts of articles or advertisements written for others for use in creation of any papers, documents, articles or promotional materials for Applicant, film impressions, photographs, magnetic tape, disks, sound or mechanical reproductions, recordings, receipts, contracts, agreements, purchase orders, purchase order acknowledgments, invoices, advertisements, receipts, drawings, vouchers, charge slips, freight bills, annual reports and telephone records, which is or was at any time in your possession, custody or control or known or believed by you to exist or to have existed. Without limitation, as used in this definition, a document is deemed to be or to have been in your "control" if you have or had the right to secure the document or a copy thereof from another

person or governmental entity, including without limitation attorneys, having actual physical possession thereof.

6. To “identify” or “state the identity of” a document means to state with respect thereto:

- (a) The nature or type of the document (e.g., letter, contract, etc.) and any official identifying number such as a serial no., registration no., filing no. or other unique identification marking(s) and the agency or entity which applied or assigned such marking(s);
- (b) Its date, and if it bears no date, the date when it was prepared;
- (c) The identity of its author, each signatory or person over whose name it is issued, and each person who received, approved or commented on it;
- (d) The identity of all persons to whom the document was addressed or distributed;
- (e) The last known physical location and address of the original and each copy, and the identity of its custodian(s);
- (f) The general subject matter or content of the document with sufficient particularity to enable it to be identified;
- (g) If the document was, but is no longer, in your possession or subject to your control (e.g., because it has been lost, destroyed, transmitted to another person, etc.), state what disposition was made of it, the date of such disposition, and the reasons for such disposition;

7. “Oral communication” means any meeting, conference, verbal exchange, comment or statement for which one or more persons were within hearing, including communication by telephone or other means of oral communication.

8. To “identify” an oral communication means to:

- (a) Identify each person who participated in or was present at the communication;
- (b) State the date and place of the communication;
- (c) Set forth the substance of what was said by each person speaking at or during the communication;
- (d) State the means or medium through which the communication was made (e.g., in person, telephone, cellular telephone, SMS or text message, other messaging system, etc.);
- (e) Identify each person or entity represented or purportedly represented by the persons participating in or present at the communication;
- (f) Identify each document relating to, concerning, referring to, or purporting to summarize or set forth all or any part of the communication.

9. The terms “trademark,” “service mark,” and “mark” each include trademarks, service marks, trade names, corporate names and use of terms analogous to use as a trademark or service mark (and include use of a word or symbol alone or in combination with other words or symbols).

10. The terms “concern” or “concerning” as used in these requests include communications, documents, or meetings, of any kind, that bear upon, describe, discuss, evidence, mention, pertain, refer, reflect, or relate, directly or indirectly, to the stated topic. Documents may have been created, dispatched, distributed, filed or maintained so as to be contemporaneous, responsive, contiguous, attached, incorporated or to cover relevant documents, and are as such within the scope of these discovery requests. With respect to any document requested below for which a claim of privilege, work product or confidentiality is made, specify (in log form) the nature of the document, identify by name, address, title and business affiliation, the writer, the addressee and all recipients thereof, and set forth the general subject matter to

which the document relates, and its date.

11. Use “on or in connection with” a product or service as used herein means use as a trademark in a manner sufficient to satisfy the use and maintenance requirements for registration of a mark under the Lanham Act.

12. As used herein, “Applicant’s ‘816 Mark” shall mean, and include, the mark Bull Device of Appln. No. 85/680,816, shown below, alone, together, or in combination with any other words, symbols, graphics or designs as a trademark, service mark, trade name, corporate name or otherwise.



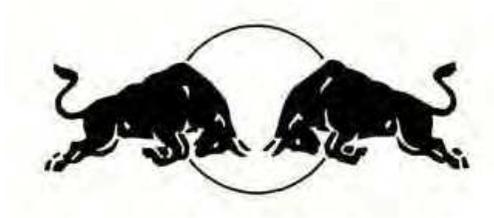
**Applicant’s ‘816 Mark**

13. As used herein, “Applicant’s ‘820 Mark” shall mean, and include, the mark and STOCKMARKET & Bull Device of Appln. No. 85/969,820, shown below, alone, together, or in combination with any other words, symbols, graphics, or designs as a trademark, service mark, trade name, corporate name or otherwise.



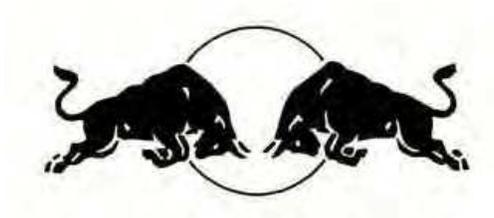
**Applicant’s ‘820 Mark**

14. As used herein, “Red Bull’s ‘045 Mark” shall mean the mark of U.S. Trademark Registration No. 2,946,045, as seen below.



**Red Bull's '045 Mark**

15. As used herein, "Red Bull's '994 Mark" shall mean the mark of U.S. Trademark Registration No. 3,051,994, as seen below.



**Red Bull's '994 Mark**

16. As used herein, "Red Bull's '283 Mark" shall mean the mark of U.S. Trademark Registration No. 3,561,283, as seen below.

**Red Bull**



**Red Bull's '283 Mark**

17. As used herein, "Red Bull's '959 Mark" shall mean the mark of U.S. Trademark Registration No. 4,031,959, as seen below.



**Red Bull's '959 Mark**

18. As used herein, Red Bull's "RED BULL and Bull Logo Marks" shall mean and include the marks subject to Red Bull's common law rights, namely, RED BULL, RED BULL & Two Bulls Logo, Two Bulls Logo, (Single) Bull Logo, and other marks incorporating the word BULL and/or the design of a bull or bovine animal.

Applicant shall separately identify the request by number pursuant to which each document is produced.

A written response to this request is required pursuant to Fed. R. Civ. P. 34.

### **REQUESTS FOR PRODUCTION**

#### **REQUEST FOR PRODUCTION NO. 1**

Specimens sufficient to show current and past advertising and promotional campaigns bearing Applicant's '816 Mark in any medium, including, but not limited to, journals, catalogues, circulars, leaflets, direct mail pieces newspaper and magazine advertisements, telephone book advertisements, press releases and electronic media, created or used by Applicant.

#### **REQUEST FOR PRODUCTION NO. 2**

Specimens sufficient to show current and past advertising and promotional campaigns bearing Applicant's '820 Mark in any medium, including, but not limited to, journals, catalogues, circulars, leaflets, direct mail pieces newspaper and magazine advertisements, telephone book advertisements, press releases and electronic media, created or used by Applicant.

#### **REQUEST FOR PRODUCTION NO. 3**

Documents sufficient to show Applicant's current and planned labels and packaging that may ultimately be seen by consumers bearing Applicant's '816 Mark, including, prototypes and/or drafts and sketches for said labels and packaging.

#### **REQUEST FOR PRODUCTION NO. 4**

Documents sufficient to show Applicant's current and planned labels and packaging that

may ultimately be seen by consumers bearing Applicant's '820 Mark, including, prototypes and/or drafts and sketches for said labels and packaging.

REQUEST FOR PRODUCTION NO. 5

Documents and things sufficient to show the creation, selection, and adoption process by You of Applicant's '816 Mark and why the bull design was chosen, including any documents and correspondence from any third party graphic designer or ad agency who created the mark.

REQUEST FOR PRODUCTION NO. 6

Documents and things sufficient to show the creation, selection, and adoption process by You of Applicant's '820 Mark and why the bull design was chosen, including any documents and correspondence from any third party graphic designer or ad agency who created the mark.

REQUEST FOR PRODUCTION NO. 7

Documents sufficient to identify each person, including, but not limited to, employees of Applicant and its affiliates, involved in the decision to adopt, use and/or seek trademark registration protection for Applicant's '816 Mark.

REQUEST FOR PRODUCTION NO. 8

Documents sufficient to identify each person, including, but not limited to, employees of Applicant and its affiliates, involved in the decision to adopt, use and/or seek trademark registration protection for Applicant's '820 Mark.

REQUEST FOR PRODUCTION NO. 9

Documents concerning any investigations to use or apply to register Applicant's '816 Mark, including, but not limited to clearance and investigative searches for service marks, trademarks, trade names, or corporate names.

REQUEST FOR PRODUCTION NO. 10

Documents concerning any investigations to use or apply to register Applicant's '820

Mark, including, but not limited to clearance and investigative searches for service marks, trademarks, trade names, or corporate names.

REQUEST FOR PRODUCTION NO. 11

All documents referring to or discussing any correspondence, telephone calls, oral discussions, meetings, messages, SMS or text messages, e-mails or other communications or contacts with any person or entity (other than your attorneys) concerning Red Bull, Red Bull's '045 Mark, Red Bull's '994 Mark, Red Bull's '283 Mark, Red Bull's '959 Mark, or Red Bull's RED BULL and Bull Logo Marks, or any similarity, conflict or confusion between Applicant's '816 Mark or Applicant's '020 Mark and Red Bull or Red Bull's '045 Mark, Red Bull's '994 Mark, Red Bull's '283 Mark, Red Bull's '959 Mark, or Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR PRODUCTION NO. 12

All documents concerning Your first knowledge pertaining to Red Bull.

REQUEST FOR PRODUCTION NO. 13

All documents concerning Your first knowledge pertaining to Red Bull's '045 Mark.

REQUEST FOR PRODUCTION NO. 14

All documents concerning Your first knowledge pertaining to Red Bull's '994 Mark.

REQUEST FOR PRODUCTION NO. 15

All documents concerning Your first knowledge pertaining to Red Bull's '283 Mark.

REQUEST FOR PRODUCTION NO. 16

All documents concerning Your first knowledge pertaining to Red Bull's '959 Mark.

REQUEST FOR PRODUCTION NO. 17

All documents concerning Your first knowledge pertaining to Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR PRODUCTION NO. 18

Documents sufficient to evidence or support each of Applicant's admissions contained in Applicant's Amended Answer to Opposer's Amended Notice Opposition for Opposition #91-210,282 (the "Parent Opposition").

REQUEST FOR PRODUCTION NO. 19

Documents sufficient to evidence or support each of Applicant's denials contained in Applicant's Amended Answer to Opposer's Amended Notice of Opposition for the Parent Opposition.

REQUEST FOR PRODUCTION NO. 20

Documents sufficient to evidence or support each of Applicant's admissions contained in Applicant's Answer to Notice of Opposition for Opposition #91-214,537 (the "Child Opposition").

REQUEST FOR PRODUCTION NO. 21

Documents sufficient to evidence or support each of Applicant's denials contained in Applicant's Answer to Notice of Opposition for the Child Opposition.

REQUEST FOR PRODUCTION NO. 22

Documents sufficient to identify all types of products and services currently or previously offered, marketed or sold under Applicant's '816 Mark, by You or on Your behalf.

REQUEST FOR PRODUCTION NO. 23

Documents sufficient to identify all types of products and services currently or previously offered, marketed or sold under Applicant's '820 Mark, by You or on Your behalf.

REQUEST FOR PRODUCTION NO. 24

Documents and things concerning or relating to all current, commercial use by You of Applicant's '816 Mark on any goods or services.

REQUEST FOR PRODUCTION NO. 25

Documents and things concerning or relating to all current, commercial use by You of Applicant's '820 Mark on any goods or services.

REQUEST FOR PRODUCTION NO. 26

Documents sufficient to identify all the types of products or services planned to be offered, marketed or sold under Applicant's '816 Mark, by You or on Your behalf.

REQUEST FOR PRODUCTION NO. 27

Documents sufficient to identify all the types of products or services planned to be offered, marketed or sold under Applicant's '820 Mark, by You or on Your behalf.

REQUEST FOR PRODUCTION NO. 28

Documents sufficient to evidence or support Applicant's bona fide intent to use Applicant's '816 Mark in U.S. commerce as a trademark on each and every item of goods and services set forth in U.S. Appln. No. 85/680,816.

REQUEST FOR PRODUCTION NO. 29

Documents sufficient to evidence or support Applicant's bona fide intent to use Applicant's '820 Mark in U.S. commerce as a trademark on each and every item of goods set forth in U.S. Appln. No. 85/969,820.

REQUEST FOR PRODUCTION NO. 30

Documents sufficient to evidence or support any and all specific steps or actions taken to make use of Applicant's '816 Mark in U.S. commerce as a trademark in connection with each and every item of goods and services set forth in U.S. Appln. No. 85/680,816.

REQUEST FOR PRODUCTION NO. 31

Documents sufficient to evidence or support any and all specific steps or actions taken to make use of Applicant's '820 Mark in U.S. commerce as a trademark in connection with each

and every item of goods set forth in U.S. Appln. No. 85/969,820.

REQUEST FOR PRODUCTION NO. 32

Documents sufficient to evidence, refer or relate to any objection, cease and desist letter or complaint relating to the mark of Appln. Nos. 85/680,816, however used, both prior to filing or since filing Applicant's '816 Mark, by or on behalf of any person or entity, whether brought by or against Applicant or any affiliate.

REQUEST FOR PRODUCTION NO. 33

Documents sufficient to evidence, refer or relate to any objection, cease and desist letter or complaint relating to the mark of Appln. Nos. 85/969,820, however used, both prior to filing or since filing Applicant's '820 Mark, by or on behalf of any person or entity, whether brought by or against Applicant or any affiliate.

REQUEST FOR PRODUCTION NO. 34

All documents which refer or relate to any administrative proceedings or litigation, in the courts, the U.S. Patent and Trademark Office or elsewhere, involving the marks of Appln. Nos. 85/680,816 or 85/969,820, whether brought by or against Applicant or any affiliate.

REQUEST FOR PRODUCTION NO. 35

All documents relating or referring to any instance in which Applicant has been aware of, or made aware of, a person being confused, mistaken, or deceived as to the source of Applicant's products or services advertised, promoted offered for sale or sold under Applicant's '816 Mark, whether brought prior to filing or since filing Applicant's '816 Mark.

REQUEST FOR PRODUCTION NO. 36

All documents relating or referring to any instance in which Applicant has been aware of, or made aware of, a person being confused, mistaken, or deceived as to the source of Applicant's products or services advertised, promoted offered for sale or sold under Applicant's '820 Mark,

whether brought prior to filing or since filing Applicant's '820 Mark.

REQUEST FOR PRODUCTION NO. 37

All documents relating or referring to any oral or written statements or inquiries by any person concerning any relationship or affiliation between Applicant and Red Bull.

REQUEST FOR PRODUCTION NO. 38

Documents sufficient to identify the channels of trade and distribution through which each and every product and services under Applicant's '816 Mark are/will be marketed and/or sold.

REQUEST FOR PRODUCTION NO. 39

Documents sufficient to identify the channels of trade and distribution through which each and every product under Applicant's '820 Mark are/will be marketed and/or sold.

REQUEST FOR PRODUCTION NO. 40

Documents sufficient to identify the target consumer group for the products, services, intended products, and intended services under Applicant's '816 Mark, including documents sufficient to identify ten (10) representative types of purchasers and/or potential purchasers of the products and/or services under Applicant's '816 Mark.

REQUEST FOR PRODUCTION NO. 41

Documents sufficient to identify the target consumer group for the products and intended products under Applicant's '820 Mark, including documents sufficient to identify ten (10) representative types of purchasers and/or potential purchasers of the products and/or services under Applicant's '820 Mark.

REQUEST FOR PRODUCTION NO. 42

Documents sufficient to show any and all negotiations and agreements relating to steps taken in preparation for the intended use of Applicant's '816 Mark in connection with each and

every good and services of Appln. No. 85/680,816, including, but not limited to, documentation and negotiations and agreements relating to or involving contracts for goods or services, license agreements, proposals, bids or any other document or discussion relating to the intended use of Applicant's '816 Mark.

REQUEST FOR PRODUCTION NO. 43

Documents sufficient to show any and all negotiations and agreements relating to steps taken in preparation for the intended use of Applicant's '820 Mark in connection with each and every good and services of Appln. No. 85/969,820, including, but not limited to, documentation and negotiations and agreements relating to or involving contracts for goods or services, license agreements, proposals, bids or any other document or discussion relating to the intended use of Applicant's '820 Mark.

REQUEST FOR PRODUCTION NO. 44

All documents and things which identify all persons or entities that have a direct or beneficial ownership interest in Stockmarket Burger, Inc. and all persons or entities in which Stockmarket Burger, Inc. has a direct or beneficial ownership interest.

REQUEST FOR PRODUCTION NO. 45

All documents and thinks which identify all past and current officers and directors of Stockmarket Burger, Inc.

REQUEST FOR PRODUCTION NO. 46

All documents and things which evidence, refer or relate to any and all changes in the corporate structure, ownership structure, financial structure and management of Stockmarket Burger, Inc. since its inception.

REQUEST FOR PRODUCTION NO. 47

All documents or things identified by Applicant in response to Opposer's First Set of

Interrogatories to Applicant.

REQUEST FOR PRODUCTION NO. 48

All documents and things (excluding correspondence to/from your attorney), not otherwise provided in response to the above, which refer or relate to this opposition proceeding. If all documents have already been included in response to the above, please indicate the Request(s) in response to which such document(s) were provided.

REQUEST FOR PRODUCTION NO. 49

All documents Applicant intends to use or may use as evidence in this opposition proceeding.

Respectfully submitted,

RED BULL GMBH  
By: /Martin R. Greenstein/  
Martin R. Greenstein  
Leah Z. Halpert  
Angelique M. Riordan  
TechMark a Law Corporation  
4820 Harwood Road, 2nd Floor  
San Jose, CA 95124-5273  
Tel: 408- 266-4700 Fax: 408-850-1955  
E-Mail: MRG@TechMark.com  
Attorneys for Opposer

Dated: May 23, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **OPPOSER'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO APPLICANT** is being served on May 23, 2014, by first class mail, postage prepaid on Applicant's Correspondent of Record at the Correspondent's address of record below:

Paulo A. de Almeida  
Patel & Almeida, P.C.  
16830 Ventura Blvd, Suite 360  
Encino, CA 91436

/Leah Z. Halpert/  
Leah Z. Halpert



foregoing entities or individuals, including but not limited to attorneys, consultants, experts, investigators, agents, or other persons acting on behalf of or in concert with Applicant.

3. The terms “trademark,” “service mark,” and “mark” each include trademarks, service marks, trade names, corporate names and use of terms analogous to use as a trademark or service mark (and include use of a word or symbol alone or in combination with other words or symbols).

4. As used herein, “Applicant’s ‘816 Mark” shall mean, and include, the mark Bull Device of Appln. No. 85/680,816, shown below, alone, together, or in combination with any other words, symbols, graphics or designs as a trademark, service mark, trade name, corporate name or otherwise.



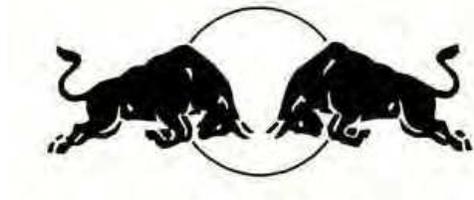
**Applicant’s ‘816 Mark**

5. As used herein, “Applicant’s ‘820 Mark” shall mean, and include, the mark and STOCKMARKET & Bull Device of Appln. No. 85/969,820, shown below, alone, together, or in combination with any other words, symbols, graphics, or designs as a trademark, service mark, trade name, corporate name or otherwise.



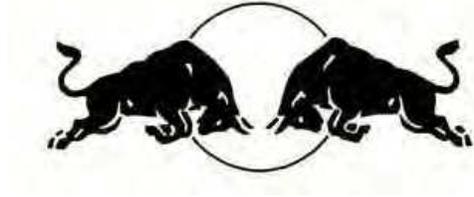
**Applicant’s ‘820 Mark**

6. As used herein, “Red Bull’s ‘045 Mark” shall mean the mark of U.S. Trademark Registration No. 2,946,045, as seen below.



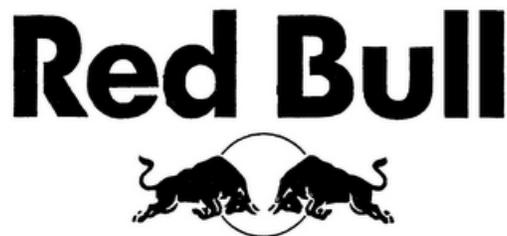
**Red Bull’s ‘045 Mark**

7. As used herein, “Red Bull’s ‘994 Mark” shall mean the mark of U.S. Trademark Registration No. 3,051,994, as seen below.



**Red Bull’s ‘994 Mark**

8. As used herein, “Red Bull’s ‘283 Mark” shall mean the mark of U.S. Trademark Registration No. 3,561,283, as seen below.



**Red Bull’s ‘283 Mark**

9. As used herein, “Red Bull’s ‘959 Mark” shall mean the mark of U.S. Trademark Registration No. 4,031,959, as seen below.



**Red Bull’s ‘959 Mark**

10. As used herein, Red Bull's "RED BULL and Bull Logo Marks" shall mean and include the marks of the pleaded registrations in Paragraphs 6-9, above, in addition to Red Bull's common law rights, namely, RED BULL, RED BULL & Two Bulls Logo, Two Bulls Logo, (Single) Bull Logo, and other marks incorporating the word BULL and/or the design of a bull or bovine animal.

11. Each of the Requests to Admit is propounded as to the Applicant, Stockmarket Burger, Inc.

### **REQUESTS FOR ADMISSION**

#### **REQUEST FOR ADMISSION NO. 1**

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Opposer.

#### **REQUEST FOR ADMISSION NO. 2**

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Opposer.

#### **REQUEST FOR ADMISSION NO. 3**

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Red Bull's '045 Mark.

#### **REQUEST FOR ADMISSION NO. 4**

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Red Bull's '045 Mark.

#### **REQUEST FOR ADMISSION NO. 5**

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Red Bull's '994 Mark.

#### **REQUEST FOR ADMISSION NO. 6**

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Red Bull's '994 Mark.

REQUEST FOR ADMISSION NO. 7

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Red Bull's '283 Mark.

REQUEST FOR ADMISSION NO. 8

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Red Bull's '283 Mark.

REQUEST FOR ADMISSION NO. 9

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Red Bull's '959 Mark.

REQUEST FOR ADMISSION NO. 10

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Red Bull's '959 Mark.

REQUEST FOR ADMISSION NO. 11

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Red Bull's '045 Mark as used in connection with "*non-alcoholic beverages, namely energy drinks and hypertonic drinks*".

REQUEST FOR ADMISSION NO. 12

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Red Bull's '045 Mark as used in connection with "*non-alcoholic beverages, namely energy drinks and hypertonic drinks*".

REQUEST FOR ADMISSION NO. 13

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Red Bull's '994 Mark as used in connection with "*apparatus for refrigerating, namely, refrigerators, refrigerated drink cabinets; clothing, namely, shirts, t-shirts, sweat shirts, blouses, hats, caps; activewear, namely, shirts, hats, caps and visors; bandannas, neckerchiefs, sweaters; resort wear, namely, t-shirts; non-alcoholic beverages, namely, soft drinks; sports drinks; energy drinks*".

REQUEST FOR ADMISSION NO. 14

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Red Bull's '994 Mark as used in connection with "*apparatus for refrigerating, namely, refrigerators, refrigerated drink cabinets; clothing, namely, shirts, t-shirts, sweat shirts, blouses, hats, caps; activewear, namely, shirts, hats, caps and visors; bandannas, neckerchiefs, sweaters; resort wear, namely, t-shirts; non-alcoholic beverages, namely, soft drinks; sports drinks; energy drinks*".

REQUEST FOR ADMISSION NO. 15

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Red Bull's '283 Mark as used in connection with "*apparatus for refrigerating, namely, refrigerating display cabinets, refrigerating or freezing showcases; refrigerators, refrigerated drinks cabinets; clothing and headgear, namely, T-shirts, blouses, sweaters, tops, jackets, vests, anoraks, wind-resistant jackets, aprons, caps, hats, headbands, braces, belts, money-belts, sun visors; sportswear, namely, shirts, pants, polo shirts, sweat shirts and sweat pants, hooded shirts and sweat shirts, shorts blouses, skirts, jumpers, jackets and coats; footwear for sport; non-alcoholic beverages, namely, sports drinks, energy drinks, and soft drinks; Alcoholic beverages, namely, vodka; Services for providing food and drinks, namely,*

*bar services, cafes, cafeterias, snack bars, restaurants, self-service restaurants, food and drink catering”.*

REQUEST FOR ADMISSION NO. 16

Prior to Applicant’s selection of Applicant’s ‘820 Mark, Applicant had actual knowledge of Red Bull’s ‘283 Mark as used in connection with “*apparatus for refrigerating, namely, refrigerating display cabinets, refrigerating or freezing showcases; refrigerators, refrigerated drinks cabinets; clothing and headgear, namely, T-shirts, blouses, sweaters, tops, jackets, vests, anoraks, wind-resistant jackets, aprons, caps, hats, headbands, braces, belts, money-belts, sun visors; sportswear, namely, shirts, pants, polo shirts, sweat shirts and sweat pants, hooded shirts and sweat shirts, shorts blouses, skirts, jumpers, jackets and coats; footwear for sport; non-alcoholic beverages, namely, sports drinks, energy drinks, and soft drinks; Alcoholic beverages, namely, vodka; Services for providing food and drinks, namely, bar services, cafes, cafeterias, snack bars, restaurants, self-service restaurants, food and drink catering”.*

REQUEST FOR ADMISSION NO. 17

Prior to Applicant’s selection of Applicant’s ‘816 Mark, Applicant had actual knowledge of Red Bull’s ‘959 Mark as used in connection with “*Providing food, beverage and souvenir stands and concessions stands featuring food, beverages, clothing, sporting equipment and souvenirs in connection with, at the location of and during the sports competitions, concerts and other events at a sports and entertainment events stadium; Arena services, namely, providing stadium facilities for sports events, cultural exhibitions and musical concerts”.*

REQUEST FOR ADMISSION NO. 18

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Red Bull's '959 Mark as used in connection with "*Providing food, beverage and souvenir stands and concessions stands featuring food, beverages, clothing, sporting equipment and souvenirs in connection with, at the location of and during the sports competitions, concerts and other events at a sports and entertainment events stadium; Arena services, namely, providing stadium facilities for sports events, cultural exhibitions and musical concerts*".

REQUEST FOR ADMISSION NO. 19

Prior to Applicant's selection of Applicant's '816 Mark, Applicant had actual knowledge of Red Bull's RED BULL and Bull Logo Marks as used in connection with beverages, energy drinks, sports drinks, soft drinks, various items of clothing, including but not limited to shirts, pants, jackets, hats and other clothing items, as well as restaurant and café services, and various other products and services related or complementary thereto.

REQUEST FOR ADMISSION NO. 20

Prior to Applicant's selection of Applicant's '820 Mark, Applicant had actual knowledge of Red Bull's RED BULL and Bull Logo Marks as used in connection with beverages, energy drinks, sports drinks, soft drinks, various items of clothing, including but not limited to shirts, pants, jackets, hats and other clothing items, as well as restaurant and café services, and various other products and services related or complementary thereto.

REQUEST FOR ADMISSION NO. 21

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with all of the goods and services claimed at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 22

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with all of the goods and services claimed at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 23

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with any of the goods and services set forth in U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 24

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with any of the goods and services set forth in U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 25

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with any of the goods and services set forth in U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 26

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with any of the goods and services set forth in U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 27

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with baking ovens at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 28

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with baking ovens at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 29

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with baking ovens.

REQUEST FOR ADMISSION NO. 30

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with baking ovens.

REQUEST FOR ADMISSION NO. 31

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with baking ovens.

REQUEST FOR ADMISSION NO. 32

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with baking ovens.

REQUEST FOR ADMISSION NO. 33

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely gas boilers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 34

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely gas boilers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 35

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial and industrial cookware, namely gas boilers.

REQUEST FOR ADMISSION NO. 36

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with any commercial and industrial cookware, namely gas boilers.

REQUEST FOR ADMISSION NO. 37

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely gas boilers.

REQUEST FOR ADMISSION NO. 38

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely gas boilers.

REQUEST FOR ADMISSION NO. 39

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely electric boilers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 40

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely electric boilers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 41

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial and industrial cookware, namely electric boilers.

REQUEST FOR ADMISSION NO. 42

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial and industrial cookware, namely electric boilers.

REQUEST FOR ADMISSION NO. 43

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely electric boilers.

REQUEST FOR ADMISSION NO. 44

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely electric boilers.

REQUEST FOR ADMISSION NO. 45

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely gas broilers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 46

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely gas broilers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 47

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial and industrial cookware, namely gas broilers.

REQUEST FOR ADMISSION NO. 48

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial and industrial cookware, namely gas broilers.

REQUEST FOR ADMISSION NO. 49

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection commercial and industrial cookware, namely gas broilers.

REQUEST FOR ADMISSION NO. 50

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection commercial and industrial cookware, namely gas broilers.

REQUEST FOR ADMISSION NO. 51

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely electric broilers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 52

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely electric broilers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 53

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial and industrial cookware, namely electric broilers.

REQUEST FOR ADMISSION NO. 54

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial and industrial cookware, namely electric broilers.

REQUEST FOR ADMISSION NO. 55

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely electric broilers.

REQUEST FOR ADMISSION NO. 56

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely electric broilers.

REQUEST FOR ADMISSION NO. 57

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely gas roasters at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 58

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely gas roasters at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 59

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial and industrial cookware, namely gas roasters.

REQUEST FOR ADMISSION NO. 60

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with any commercial and industrial cookware, namely gas roasters.

REQUEST FOR ADMISSION NO. 61

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely gas roasters.

REQUEST FOR ADMISSION NO. 62

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely gas roasters.

REQUEST FOR ADMISSION NO. 63

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely electric roasters at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 64

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely electric roasters at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 65

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial and industrial cookware, namely electric roasters.

REQUEST FOR ADMISSION NO. 66

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial and industrial cookware, namely electric roasters.

REQUEST FOR ADMISSION NO. 67

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely electric roasters.

REQUEST FOR ADMISSION NO. 68

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely electric roasters.

REQUEST FOR ADMISSION NO. 69

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely gas braising pans at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 70

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely gas braising pans at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 71

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial and industrial cookware, namely gas braising pans.

REQUEST FOR ADMISSION NO. 72

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial and industrial cookware, namely gas braising pans.

REQUEST FOR ADMISSION NO. 73

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely gas braising pans.

REQUEST FOR ADMISSION NO. 74

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely gas braising pans.

REQUEST FOR ADMISSION NO. 75

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely electric braising pans at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 76

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely electric braising pans at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 77

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial and industrial cookware, namely electric braising pans.

REQUEST FOR ADMISSION NO. 78

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial and industrial cookware, namely electric braising pans.

REQUEST FOR ADMISSION NO. 79

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial and industrial cookware, namely electric braising pans.

REQUEST FOR ADMISSION NO. 80

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial and industrial cookware, namely electric braising pans.

REQUEST FOR ADMISSION NO. 81

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial cooking ovens at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 82

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial cooking ovens claimed at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 83

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial cooking ovens.

REQUEST FOR ADMISSION NO. 84

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial cooking ovens.

REQUEST FOR ADMISSION NO. 85

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial cooking ovens.

REQUEST FOR ADMISSION NO. 86

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial cooking ovens.

REQUEST FOR ADMISSION NO. 87

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial refrigerators and parts and fittings therefor at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 88

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial refrigerators and parts and fittings therefor at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 89

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial refrigerators and parts and fittings therefor.

REQUEST FOR ADMISSION NO. 90

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial refrigerators and parts and fittings therefor.

REQUEST FOR ADMISSION NO. 91

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial refrigerators and parts and fittings therefor.

REQUEST FOR ADMISSION NO. 92

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial refrigerators and parts and fittings therefor.

REQUEST FOR ADMISSION NO. 93

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with commercial freezers and parts and fittings therefor at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 94

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with commercial freezers and parts and fittings therefor at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 95

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with commercial freezers and parts and fittings therefor.

REQUEST FOR ADMISSION NO. 96

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with commercial freezers and parts and fittings therefor.

REQUEST FOR ADMISSION NO. 97

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with commercial freezers and parts and fittings therefor.

REQUEST FOR ADMISSION NO. 98

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with commercial freezers and parts and fittings therefor.

REQUEST FOR ADMISSION NO. 99

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with deep fryer, electric at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 100

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with deep fryer, electric at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 101

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with deep fryer, electric.

REQUEST FOR ADMISSION NO. 102

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with deep fryer, electric.

REQUEST FOR ADMISSION NO. 103

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with deep fryer, electric.

REQUEST FOR ADMISSION NO. 104

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with deep fryer, electric.

REQUEST FOR ADMISSION NO. 105

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with deep frying machines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 106

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with deep frying machines at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 107

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with deep frying machines.

REQUEST FOR ADMISSION NO. 108

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with deep frying machines.

REQUEST FOR ADMISSION NO. 109

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with deep frying machines.

REQUEST FOR ADMISSION NO. 110

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with deep frying machines.

REQUEST FOR ADMISSION NO. 111

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with electric coffee machines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 112

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with electric coffee machines at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 113

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with electric coffee machines.

REQUEST FOR ADMISSION NO. 114

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with electric coffee machines.

REQUEST FOR ADMISSION NO. 115

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with electric coffee machines.

REQUEST FOR ADMISSION NO. 116

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with electric coffee machines.

REQUEST FOR ADMISSION NO. 117

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with electric coffee brewers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 118

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with electric coffee brewers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 119

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with electric coffee brewers.

REQUEST FOR ADMISSION NO. 120

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with electric coffee brewers.

REQUEST FOR ADMISSION NO. 121

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with electric coffee brewers.

REQUEST FOR ADMISSION NO. 122

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with electric coffee brewers.

REQUEST FOR ADMISSION NO. 123

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with electric deep fryers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 124

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with electric deep fryers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 125

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with electric deep fryers.

REQUEST FOR ADMISSION NO. 126

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with electric deep fryers.

REQUEST FOR ADMISSION NO. 127

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with electric deep fryers.

REQUEST FOR ADMISSION NO. 128

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with electric deep fryers.

REQUEST FOR ADMISSION NO. 129

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with electric espresso machines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 130

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with electric espresso machines at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 131

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with electric espresso machines.

REQUEST FOR ADMISSION NO. 132

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with electric espresso machines.

REQUEST FOR ADMISSION NO. 133

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with electric espresso machines.

REQUEST FOR ADMISSION NO. 134

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with electric espresso machines.

REQUEST FOR ADMISSION NO. 135

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with electric lighting fixtures at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 136

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with electric lighting fixtures at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 137

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with any electric lighting fixtures.

REQUEST FOR ADMISSION NO. 138

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with electric lighting fixtures.

REQUEST FOR ADMISSION NO. 139

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with electric lighting fixtures.

REQUEST FOR ADMISSION NO. 140

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with electric lighting fixtures.

REQUEST FOR ADMISSION NO. 141

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with electric refrigerators at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 142

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with electric refrigerators at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 143

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with electric refrigerators.

REQUEST FOR ADMISSION NO. 144

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with electric refrigerators.

REQUEST FOR ADMISSION NO. 145

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with electric refrigerators.

REQUEST FOR ADMISSION NO. 146

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with electric refrigerators.

REQUEST FOR ADMISSION NO. 147

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with electric yogurt makers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 148

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with electric yogurt makers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 149

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with electric yogurt makers.

REQUEST FOR ADMISSION NO. 150

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with electric yogurt makers.

REQUEST FOR ADMISSION NO. 151

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with electric yogurt makers.

REQUEST FOR ADMISSION NO. 152

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with electric yogurt makers.

REQUEST FOR ADMISSION NO. 153

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with filters for drinking water at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 154

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with filters for drinking water at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 155

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with filters for drinking water.

REQUEST FOR ADMISSION NO. 156

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with filters for drinking water.

REQUEST FOR ADMISSION NO. 157

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with filters for drinking water.

REQUEST FOR ADMISSION NO. 158

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with filters for drinking water.

REQUEST FOR ADMISSION NO. 159

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with freezers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 160

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with freezers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 161

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with freezers.

REQUEST FOR ADMISSION NO. 162

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with freezers.

REQUEST FOR ADMISSION NO. 163

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with freezers.

REQUEST FOR ADMISSION NO. 164

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with freezers.

REQUEST FOR ADMISSION NO. 165

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with frozen dessert dispenser [sic] at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 166

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with frozen dessert dispenser [sic] at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 167

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with frozen dessert dispenser [sic].

REQUEST FOR ADMISSION NO. 168

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with frozen dessert dispenser [sic].

REQUEST FOR ADMISSION NO. 169

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with frozen dessert dispenser [sic].

REQUEST FOR ADMISSION NO. 170

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with frozen dessert dispenser [sic].

REQUEST FOR ADMISSION NO. 171

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with heated merchandise display cases at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 172

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with heated merchandise display cases at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 173

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with heated merchandise display cases.

REQUEST FOR ADMISSION NO. 174

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with any heated merchandise display cases.

REQUEST FOR ADMISSION NO. 175

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with heated merchandise display cases.

REQUEST FOR ADMISSION NO. 176

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with heated merchandise display cases.

REQUEST FOR ADMISSION NO. 177

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with ice machines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 178

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with ice machines at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 179

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with ice machines.

REQUEST FOR ADMISSION NO. 180

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with ice machines.

REQUEST FOR ADMISSION NO. 181

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with ice machines.

REQUEST FOR ADMISSION NO. 182

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with ice machines.

REQUEST FOR ADMISSION NO. 183

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with industrial boilers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 184

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with industrial boilers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 185

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with industrial boilers.

REQUEST FOR ADMISSION NO. 186

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with any industrial boilers.

REQUEST FOR ADMISSION NO. 187

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with industrial boilers.

REQUEST FOR ADMISSION NO. 188

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with industrial boilers.

REQUEST FOR ADMISSION NO. 189

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with industrial deep fryers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 190

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with industrial deep fryers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 191

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with industrial deep fryers.

REQUEST FOR ADMISSION NO. 192

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with any industrial deep fryers.

REQUEST FOR ADMISSION NO. 193

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection industrial deep fryers.

REQUEST FOR ADMISSION NO. 194

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with industrial deep fryers.

REQUEST FOR ADMISSION NO. 195

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with refrigerated beverage dispensing units at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 196

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with refrigerated beverage dispensing units at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 197

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with refrigerated beverage dispensing units.

REQUEST FOR ADMISSION NO. 198

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with refrigerated beverage dispensing units.

REQUEST FOR ADMISSION NO. 199

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with refrigerated beverage dispensing units.

REQUEST FOR ADMISSION NO. 200

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with refrigerated beverage dispensing units.

REQUEST FOR ADMISSION NO. 201

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with refrigerators at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 202

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with refrigerators at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 203

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with refrigerators.

REQUEST FOR ADMISSION NO. 204

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with refrigerators.

REQUEST FOR ADMISSION NO. 205

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with refrigerators.

REQUEST FOR ADMISSION NO. 206

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with refrigerators.

REQUEST FOR ADMISSION NO. 207

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with freezers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 208

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with freezers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 209

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with freezers.

REQUEST FOR ADMISSION NO. 210

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with freezers.

REQUEST FOR ADMISSION NO. 211

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with freezers.

REQUEST FOR ADMISSION NO. 212

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with freezers.

REQUEST FOR ADMISSION NO. 213

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with water purification machines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 214

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with water purification machines at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 215

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with water purification machines.

REQUEST FOR ADMISSION NO. 216

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with any water purification machines.

REQUEST FOR ADMISSION NO. 217

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with water purification machines.

REQUEST FOR ADMISSION NO. 218

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with water purification machines.

REQUEST FOR ADMISSION NO. 219

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with water purification units at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 220

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with water purification units at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 221

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with water purification units.

REQUEST FOR ADMISSION NO. 222

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with water purification units.

REQUEST FOR ADMISSION NO. 223

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with water purification units.

REQUEST FOR ADMISSION NO. 224

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with water purification units.

REQUEST FOR ADMISSION NO. 225

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with water sterilizers claimed at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 226

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with water sterilizers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 227

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with water sterilizers.

REQUEST FOR ADMISSION NO. 228

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with any water sterilizers.

REQUEST FOR ADMISSION NO. 229

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with water sterilizers.

REQUEST FOR ADMISSION NO. 230

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with water sterilizers.

REQUEST FOR ADMISSION NO. 231

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with water softening units at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 232

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with water softening units at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 233

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with water softening units.

REQUEST FOR ADMISSION NO. 234

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with water softening units.

REQUEST FOR ADMISSION NO. 235

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with water softening units.

REQUEST FOR ADMISSION NO. 236

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with water softening units.

REQUEST FOR ADMISSION NO. 237

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with electric food warmers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 238

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with electric food warmers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 239

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with electric food warmers.

REQUEST FOR ADMISSION NO. 240

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with electric food warmers.

REQUEST FOR ADMISSION NO. 241

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with electric food warmers.

REQUEST FOR ADMISSION NO. 242

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with electric food warmers.

REQUEST FOR ADMISSION NO. 243

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with powered coffee roasters at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 244

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with powered coffee roasters at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 245

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with powered coffee roasters.

REQUEST FOR ADMISSION NO. 246

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with powered coffee roasters.

REQUEST FOR ADMISSION NO. 247

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with powered coffee roasters.

REQUEST FOR ADMISSION NO. 248

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with powered coffee roasters.

REQUEST FOR ADMISSION NO. 249

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with powered seed roasters at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 250

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with powered seed roasters at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 251

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with powered seed roasters.

REQUEST FOR ADMISSION NO. 252

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with powered seed roasters.

REQUEST FOR ADMISSION NO. 253

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with powered seed roasters.

REQUEST FOR ADMISSION NO. 254

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with powered seed roasters.

REQUEST FOR ADMISSION NO. 255

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with powered cocoa bean roasters at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 256

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with powered cocoa bean roasters at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 257

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with powered cocoa bean roasters.

REQUEST FOR ADMISSION NO. 258

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with powered cocoa bean roasters.

REQUEST FOR ADMISSION NO. 259

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with powered cocoa bean roasters.

REQUEST FOR ADMISSION NO. 260

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with powered cocoa bean roasters.

REQUEST FOR ADMISSION NO. 261

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, aprons at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 262

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, aprons at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 263

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, aprons.

REQUEST FOR ADMISSION NO. 264

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, aprons.

REQUEST FOR ADMISSION NO. 265

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, aprons.

REQUEST FOR ADMISSION NO. 266

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, aprons.

REQUEST FOR ADMISSION NO. 267

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, belts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 268

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, belts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 269

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, belts.

REQUEST FOR ADMISSION NO. 270

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, belts.

REQUEST FOR ADMISSION NO. 271

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, belts.

REQUEST FOR ADMISSION NO. 272

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, belts.

REQUEST FOR ADMISSION NO. 273

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, gloves at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 274

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, gloves at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 275

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, gloves.

REQUEST FOR ADMISSION NO. 276

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, gloves.

REQUEST FOR ADMISSION NO. 277

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, gloves.

REQUEST FOR ADMISSION NO. 278

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, gloves.

REQUEST FOR ADMISSION NO. 279

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, hats at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 280

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, hats at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 281

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, hats.

REQUEST FOR ADMISSION NO. 282

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, hats.

REQUEST FOR ADMISSION NO. 283

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, hats.

REQUEST FOR ADMISSION NO. 284

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, hats.

REQUEST FOR ADMISSION NO. 285

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, hooded sweatshirts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 286

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, hooded sweatshirts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 287

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, hooded sweatshirts.

REQUEST FOR ADMISSION NO. 288

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, hooded sweatshirts.

REQUEST FOR ADMISSION NO. 289

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, hooded sweatshirts.

REQUEST FOR ADMISSION NO. 290

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, hooded sweatshirts.

REQUEST FOR ADMISSION NO. 291

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, jackets at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 292

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, jackets at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 293

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, jackets.

REQUEST FOR ADMISSION NO. 294

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, jackets.

REQUEST FOR ADMISSION NO. 295

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, jackets.

REQUEST FOR ADMISSION NO. 296

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, jackets.

REQUEST FOR ADMISSION NO. 297

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, jeans at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 298

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, jeans at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 299

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, jeans.

REQUEST FOR ADMISSION NO. 300

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, jeans.

REQUEST FOR ADMISSION NO. 301

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, jeans.

REQUEST FOR ADMISSION NO. 302

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, jeans.

REQUEST FOR ADMISSION NO. 303

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, pants at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 304

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, pants at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 305

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, pants.

REQUEST FOR ADMISSION NO. 306

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, pants.

REQUEST FOR ADMISSION NO. 307

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, pants.

REQUEST FOR ADMISSION NO. 308

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, pants.

REQUEST FOR ADMISSION NO. 309

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, sandals at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 310

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, sandals at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 311

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, sandals.

REQUEST FOR ADMISSION NO. 312

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, sandals.

REQUEST FOR ADMISSION NO. 313

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, sandals.

REQUEST FOR ADMISSION NO. 314

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, sandals.

REQUEST FOR ADMISSION NO. 315

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, scarves at the time of filing U.S. Appl. No. 85/680,816.

REQUEST FOR ADMISSION NO. 316

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, scarves at the time of filing U.S. Appl. No. 85/969,820.

REQUEST FOR ADMISSION NO. 317

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, scarves.

REQUEST FOR ADMISSION NO. 318

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, scarves.

REQUEST FOR ADMISSION NO. 319

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, scarves.

REQUEST FOR ADMISSION NO. 320

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, scarves.

REQUEST FOR ADMISSION NO. 321

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, shirts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 322

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, shirts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 323

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, shirts.

REQUEST FOR ADMISSION NO. 324

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, shirts.

REQUEST FOR ADMISSION NO. 325

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, shirts.

REQUEST FOR ADMISSION NO. 326

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, shirts.

REQUEST FOR ADMISSION NO. 327

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, shoes at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 328

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, shoes at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 329

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, shoes.

REQUEST FOR ADMISSION NO. 330

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, shoes.

REQUEST FOR ADMISSION NO. 331

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, shoes.

REQUEST FOR ADMISSION NO. 332

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, shoes.

REQUEST FOR ADMISSION NO. 333

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, shorts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 334

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, shorts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 335

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, shorts.

REQUEST FOR ADMISSION NO. 336

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, shorts.

REQUEST FOR ADMISSION NO. 337

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, shorts.

REQUEST FOR ADMISSION NO. 338

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, shorts.

REQUEST FOR ADMISSION NO. 339

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, sleepwear at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 340

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, sleepwear at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 341

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, sleepwear.

REQUEST FOR ADMISSION NO. 342

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, sleepwear.

REQUEST FOR ADMISSION NO. 343

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, sleepwear.

REQUEST FOR ADMISSION NO. 344

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, sleepwear.

REQUEST FOR ADMISSION NO. 345

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, sneakers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 346

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, sneakers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 347

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, sneakers.

REQUEST FOR ADMISSION NO. 348

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, sneakers.

REQUEST FOR ADMISSION NO. 349

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, sneakers.

REQUEST FOR ADMISSION NO. 350

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, sneakers.

REQUEST FOR ADMISSION NO. 351

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, socks at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 352

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, socks at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 353

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, socks.

REQUEST FOR ADMISSION NO. 354

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, socks.

REQUEST FOR ADMISSION NO. 355

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, socks.

REQUEST FOR ADMISSION NO. 356

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, socks.

REQUEST FOR ADMISSION NO. 357

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, sweatshirts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 358

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, sweatshirts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 359

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, sweatshirts.

REQUEST FOR ADMISSION NO. 360

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, sweatshirts.

REQUEST FOR ADMISSION NO. 361

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, sweatshirts.

REQUEST FOR ADMISSION NO. 362

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, sweatshirts.

REQUEST FOR ADMISSION NO. 363

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, swimwear at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 364

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, swimwear at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 365

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, swimwear.

REQUEST FOR ADMISSION NO. 366

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, swimwear.

REQUEST FOR ADMISSION NO. 367

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, swimwear.

REQUEST FOR ADMISSION NO. 368

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, swimwear.

REQUEST FOR ADMISSION NO. 369

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, ties at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 370

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, ties at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 371

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, ties.

REQUEST FOR ADMISSION NO. 372

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, ties.

REQUEST FOR ADMISSION NO. 373

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, ties.

REQUEST FOR ADMISSION NO. 374

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, ties.

REQUEST FOR ADMISSION NO. 375

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, underwear at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 376

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, underwear at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 377

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, underwear.

REQUEST FOR ADMISSION NO. 378

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, underwear.

REQUEST FOR ADMISSION NO. 379

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, underwear.

REQUEST FOR ADMISSION NO. 380

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, underwear.

REQUEST FOR ADMISSION NO. 381

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, uniforms at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 382

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, uniforms at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 383

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, uniforms.

REQUEST FOR ADMISSION NO. 384

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, uniforms.

REQUEST FOR ADMISSION NO. 385

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, uniforms.

REQUEST FOR ADMISSION NO. 386

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, uniforms.

REQUEST FOR ADMISSION NO. 387

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, caps at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 388

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, caps at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 389

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, caps.

REQUEST FOR ADMISSION NO. 390

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, caps.

REQUEST FOR ADMISSION NO. 391

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, caps.

REQUEST FOR ADMISSION NO. 392

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, caps.

REQUEST FOR ADMISSION NO. 393

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, caps with visors at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 394

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, caps with visors at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 395

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, caps with visors.

REQUEST FOR ADMISSION NO. 396

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, caps with visors.

REQUEST FOR ADMISSION NO. 397

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, caps with visors.

REQUEST FOR ADMISSION NO. 398

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, caps with visors.

REQUEST FOR ADMISSION NO. 399

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, chef's [sic] hats at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 400

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, chef's [sic] hats at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 401

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, chef's [sic] hats.

REQUEST FOR ADMISSION NO. 402

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, chef's [sic] hats.

REQUEST FOR ADMISSION NO. 403

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, chef's [sic] hats.

REQUEST FOR ADMISSION NO. 404

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, chef's [sic] hats.

REQUEST FOR ADMISSION NO. 405

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, chefs coats at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 406

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, chefs coats at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 407

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, chefs coats.

REQUEST FOR ADMISSION NO. 408

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, chefs coats.

REQUEST FOR ADMISSION NO. 409

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, chefs coats.

REQUEST FOR ADMISSION NO. 410

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, chefs coats.

REQUEST FOR ADMISSION NO. 411

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, coats at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 412

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, coats at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 413

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, coats.

REQUEST FOR ADMISSION NO. 414

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, coats.

REQUEST FOR ADMISSION NO. 415

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, coats.

REQUEST FOR ADMISSION NO. 416

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, coats.

REQUEST FOR ADMISSION NO. 417

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, collared shirts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 418

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, collared shirts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 419

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, collared shirts.

REQUEST FOR ADMISSION NO. 420

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, collared shirts.

REQUEST FOR ADMISSION NO. 421

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, collared shirts.

REQUEST FOR ADMISSION NO. 422

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, collared shirts.

REQUEST FOR ADMISSION NO. 423

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, footwear for men at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 424

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, footwear for men at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 425

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, footwear for men.

REQUEST FOR ADMISSION NO. 426

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, footwear for men.

REQUEST FOR ADMISSION NO. 427

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, footwear for men.

REQUEST FOR ADMISSION NO. 428

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, footwear for men.

REQUEST FOR ADMISSION NO. 429

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, footwear for women at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 430

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, footwear for women at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 431

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, footwear for women.

REQUEST FOR ADMISSION NO. 432

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, footwear for women.

REQUEST FOR ADMISSION NO. 433

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, footwear for women.

REQUEST FOR ADMISSION NO. 434

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, footwear for women.

REQUEST FOR ADMISSION NO. 435

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, jump suits at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 436

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, jump suits at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 437

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, jump suits.

REQUEST FOR ADMISSION NO. 438

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, jump suits.

REQUEST FOR ADMISSION NO. 439

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, jump suits.

REQUEST FOR ADMISSION NO. 440

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, jump suits.

REQUEST FOR ADMISSION NO. 441

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, men's suits at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 442

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, men's suits at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 443

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, men's suits.

REQUEST FOR ADMISSION NO. 444

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, men's suits.

REQUEST FOR ADMISSION NO. 445

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, men's suits.

REQUEST FOR ADMISSION NO. 446

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, men's suits.

REQUEST FOR ADMISSION NO. 447

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, women's suits at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 448

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, women's suits at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 449

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, women's suits.

REQUEST FOR ADMISSION NO. 450

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, women's suits.

REQUEST FOR ADMISSION NO. 451

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, women's suits.

REQUEST FOR ADMISSION NO. 452

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, women's suits.

REQUEST FOR ADMISSION NO. 453

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, skirts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 454

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, skirts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 455

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, skirts.

REQUEST FOR ADMISSION NO. 456

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, skirts.

REQUEST FOR ADMISSION NO. 457

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, skirts.

REQUEST FOR ADMISSION NO. 458

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, skirts.

REQUEST FOR ADMISSION NO. 459

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, shorts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 460

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, shorts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 461

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, shorts.

REQUEST FOR ADMISSION NO. 462

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, shorts.

REQUEST FOR ADMISSION NO. 463

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, shorts.

REQUEST FOR ADMISSION NO. 464

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, shorts.

REQUEST FOR ADMISSION NO. 465

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, suspenders at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 466

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, suspenders at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 467

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, suspenders.

REQUEST FOR ADMISSION NO. 468

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, suspenders.

REQUEST FOR ADMISSION NO. 469

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, suspenders.

REQUEST FOR ADMISSION NO. 470

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, suspenders.

REQUEST FOR ADMISSION NO. 471

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with clothing, namely, vests at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 472

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with clothing, namely, vests at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 473

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with clothing, namely, vests.

REQUEST FOR ADMISSION NO. 474

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with clothing, namely, vests.

REQUEST FOR ADMISSION NO. 475

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with clothing, namely, vests.

REQUEST FOR ADMISSION NO. 476

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with clothing, namely, vests.

REQUEST FOR ADMISSION NO. 477

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with allspice at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 478

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with allspice at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 479

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with allspice.

REQUEST FOR ADMISSION NO. 480

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with allspice.

REQUEST FOR ADMISSION NO. 481

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with allspice.

REQUEST FOR ADMISSION NO. 482

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with allspice.

REQUEST FOR ADMISSION NO. 483

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 484

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with coffee at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 485

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee.

REQUEST FOR ADMISSION NO. 486

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with coffee.

REQUEST FOR ADMISSION NO. 487

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee.

REQUEST FOR ADMISSION NO. 488

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with coffee.

REQUEST FOR ADMISSION NO. 489

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with espresso at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 490

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with espresso at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 491

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with espresso.

REQUEST FOR ADMISSION NO. 492

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with espresso.

REQUEST FOR ADMISSION NO. 493

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with espresso.

REQUEST FOR ADMISSION NO. 494

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with espresso.

REQUEST FOR ADMISSION NO. 495

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with espresso drinks at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 496

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with espresso drinks at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 497

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with espresso drinks.

REQUEST FOR ADMISSION NO. 498

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with espresso drinks.

REQUEST FOR ADMISSION NO. 499

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with espresso drinks.

REQUEST FOR ADMISSION NO. 500

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with espresso drinks.

REQUEST FOR ADMISSION NO. 501

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with iced coffee at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 502

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with iced coffee at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 503

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with iced coffee.

REQUEST FOR ADMISSION NO. 504

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with iced coffee.

REQUEST FOR ADMISSION NO. 505

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with iced coffee.

REQUEST FOR ADMISSION NO. 506

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with iced coffee.

REQUEST FOR ADMISSION NO. 507

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee beverages with milk at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 508

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with coffee beverages with milk at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 509

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee beverages with milk.

REQUEST FOR ADMISSION NO. 510

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with coffee beverages with milk.

REQUEST FOR ADMISSION NO. 511

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee beverages with milk.

REQUEST FOR ADMISSION NO. 512

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with coffee beverages with milk.

REQUEST FOR ADMISSION NO. 513

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with artificial coffee at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 514

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with artificial coffee at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 515

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with artificial coffee.

REQUEST FOR ADMISSION NO. 516

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with artificial coffee.

REQUEST FOR ADMISSION NO. 517

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with artificial coffee.

REQUEST FOR ADMISSION NO. 518

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with artificial coffee.

REQUEST FOR ADMISSION NO. 519

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with artificial tea at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 520

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with artificial tea at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 521

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with artificial tea.

REQUEST FOR ADMISSION NO. 522

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with artificial tea.

REQUEST FOR ADMISSION NO. 523

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with artificial tea.

REQUEST FOR ADMISSION NO. 524

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with artificial tea.

REQUEST FOR ADMISSION NO. 525

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with ground coffee beans at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 526

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with ground coffee beans at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 527

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with ground coffee beans.

REQUEST FOR ADMISSION NO. 528

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with ground coffee beans.

REQUEST FOR ADMISSION NO. 529

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with ground coffee beans.

REQUEST FOR ADMISSION NO. 530

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with ground coffee beans.

REQUEST FOR ADMISSION NO. 531

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with bakery desserts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 532

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with bakery desserts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 533

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with bakery desserts.

REQUEST FOR ADMISSION NO. 534

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with bakery desserts.

REQUEST FOR ADMISSION NO. 535

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with bakery desserts.

REQUEST FOR ADMISSION NO. 536

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with bakery desserts.

REQUEST FOR ADMISSION NO. 537

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with bakery goods at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 538

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with bakery goods at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 539

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with bakery goods.

REQUEST FOR ADMISSION NO. 540

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with bakery goods.

REQUEST FOR ADMISSION NO. 541

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with bakery goods.

REQUEST FOR ADMISSION NO. 542

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with bakery goods.

REQUEST FOR ADMISSION NO. 543

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with barbecue sauce at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 544

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with barbecue sauce at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 545

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with barbecue sauce.

REQUEST FOR ADMISSION NO. 546

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with barbecue sauce.

REQUEST FOR ADMISSION NO. 547

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with barbecue sauce.

REQUEST FOR ADMISSION NO. 548

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with barbecue sauce.

REQUEST FOR ADMISSION NO. 549

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with beverages made of coffee at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 550

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with beverages made of coffee at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 551

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with beverages made of coffee.

REQUEST FOR ADMISSION NO. 552

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with beverages made of coffee.

REQUEST FOR ADMISSION NO. 553

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with beverages made of coffee.

REQUEST FOR ADMISSION NO. 554

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with beverages made of coffee.

REQUEST FOR ADMISSION NO. 555

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with beverages made of tea at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 556

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with beverages made of tea at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 557

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with beverages made of tea.

REQUEST FOR ADMISSION NO. 558

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with beverages made of tea.

REQUEST FOR ADMISSION NO. 559

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with beverages made of tea.

REQUEST FOR ADMISSION NO. 560

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with beverages made of tea.

REQUEST FOR ADMISSION NO. 561

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with beverages with a coffee base at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 562

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with beverages with a coffee base at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 563

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with beverages with a coffee base.

REQUEST FOR ADMISSION NO. 564

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with beverages with a coffee base.

REQUEST FOR ADMISSION NO. 565

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with beverages with a coffee base.

REQUEST FOR ADMISSION NO. 566

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with beverages with a coffee base.

REQUEST FOR ADMISSION NO. 567

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with beverages with a chocolate base at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 568

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with beverages with a chocolate base at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 569

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with beverages with a chocolate base.

REQUEST FOR ADMISSION NO. 570

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with beverages with a chocolate base.

REQUEST FOR ADMISSION NO. 571

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with beverages with a chocolate base.

REQUEST FOR ADMISSION NO. 572

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with beverages with a chocolate base.

REQUEST FOR ADMISSION NO. 573

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with bread at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 574

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with bread at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 575

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with bread.

REQUEST FOR ADMISSION NO. 576

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with bread.

REQUEST FOR ADMISSION NO. 577

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with bread.

REQUEST FOR ADMISSION NO. 578

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with bread.

REQUEST FOR ADMISSION NO. 579

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with bread and buns at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 580

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with bread and buns at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 581

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with bread and buns.

REQUEST FOR ADMISSION NO. 582

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with bread and buns.

REQUEST FOR ADMISSION NO. 583

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with bread and buns.

REQUEST FOR ADMISSION NO. 584

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with bread and buns.

REQUEST FOR ADMISSION NO. 585

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with breadsticks at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 586

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with breadsticks at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 587

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with breadsticks.

REQUEST FOR ADMISSION NO. 588

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with breadsticks.

REQUEST FOR ADMISSION NO. 589

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with breadsticks.

REQUEST FOR ADMISSION NO. 590

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with breadsticks.

REQUEST FOR ADMISSION NO. 591

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with buns at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 592

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with buns at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 593

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with buns.

REQUEST FOR ADMISSION NO. 594

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with buns.

REQUEST FOR ADMISSION NO. 595

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with buns.

REQUEST FOR ADMISSION NO. 596

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with buns.

REQUEST FOR ADMISSION NO. 597

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with burgers contained in bread rolls at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 598

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with burgers contained in bread rolls at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 599

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with burgers contained in bread rolls.

REQUEST FOR ADMISSION NO. 600

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with burgers contained in bread rolls.

REQUEST FOR ADMISSION NO. 601

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with burgers contained in bread rolls.

REQUEST FOR ADMISSION NO. 602

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with burgers contained in bread rolls.

REQUEST FOR ADMISSION NO. 603

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with biscuits at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 604

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with biscuits at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 605

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with biscuits.

REQUEST FOR ADMISSION NO. 606

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with biscuits.

REQUEST FOR ADMISSION NO. 607

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with biscuits.

REQUEST FOR ADMISSION NO. 608

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with biscuits.

REQUEST FOR ADMISSION NO. 609

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with caffeine-free coffee at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 610

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with caffeine-free coffee at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 611

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with caffeine-free coffee.

REQUEST FOR ADMISSION NO. 612

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with caffeine-free coffee.

REQUEST FOR ADMISSION NO. 613

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with caffeine-free coffee.

REQUEST FOR ADMISSION NO. 614

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with caffeine-free coffee.

REQUEST FOR ADMISSION NO. 615

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with candy at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 616

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with candy at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 617

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with candy.

REQUEST FOR ADMISSION NO. 618

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with candy.

REQUEST FOR ADMISSION NO. 619

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with candy.

REQUEST FOR ADMISSION NO. 620

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with candy.

REQUEST FOR ADMISSION NO. 621

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with cappuccino at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 622

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with cappuccino at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 623

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with cappuccino.

REQUEST FOR ADMISSION NO. 624

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with cappuccino.

REQUEST FOR ADMISSION NO. 625

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with cappuccino.

REQUEST FOR ADMISSION NO. 626

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with cappuccino.

REQUEST FOR ADMISSION NO. 627

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with cheeseburger sandwiches at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 628

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with cheeseburger sandwiches at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 629

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with cheeseburger sandwiches.

REQUEST FOR ADMISSION NO. 630

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with cheeseburger sandwiches.

REQUEST FOR ADMISSION NO. 631

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with cheeseburger sandwiches.

REQUEST FOR ADMISSION NO. 632

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with cheeseburger sandwiches.

REQUEST FOR ADMISSION NO. 633

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with chicken wing sauce at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 634

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with chicken wing sauce at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 635

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with chicken wing sauce.

REQUEST FOR ADMISSION NO. 636

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with chicken wing sauce.

REQUEST FOR ADMISSION NO. 637

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with chicken wing sauce.

REQUEST FOR ADMISSION NO. 638

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with chicken wing sauce.

REQUEST FOR ADMISSION NO. 639

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with chili powders at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 640

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with chili powders at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 641

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with chili powders.

REQUEST FOR ADMISSION NO. 642

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with chili powders.

REQUEST FOR ADMISSION NO. 643

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with chili powders.

REQUEST FOR ADMISSION NO. 644

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with chili powders.

REQUEST FOR ADMISSION NO. 645

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with chili sauce at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 646

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with chili sauce at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 647

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with chili sauce.

REQUEST FOR ADMISSION NO. 648

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with chili sauce.

REQUEST FOR ADMISSION NO. 649

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with chili sauce.

REQUEST FOR ADMISSION NO. 650

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with chili sauce.

REQUEST FOR ADMISSION NO. 651

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with chili seasoning at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 652

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with chili seasoning at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 653

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with chili seasoning.

REQUEST FOR ADMISSION NO. 654

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with chili seasoning.

REQUEST FOR ADMISSION NO. 655

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with chili seasoning.

REQUEST FOR ADMISSION NO. 656

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with chili seasoning.

REQUEST FOR ADMISSION NO. 657

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with cocktail sauces at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 658

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with cocktail sauces at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 659

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with cocktail sauces.

REQUEST FOR ADMISSION NO. 660

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with cocktail sauces.

REQUEST FOR ADMISSION NO. 661

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with cocktail sauces.

REQUEST FOR ADMISSION NO. 662

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with cocktail sauces.

REQUEST FOR ADMISSION NO. 663

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee extracts at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 664

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with coffee extracts at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 665

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee extracts.

REQUEST FOR ADMISSION NO. 666

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with coffee extracts.

REQUEST FOR ADMISSION NO. 667

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee extracts.

REQUEST FOR ADMISSION NO. 668

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with coffee extracts.

REQUEST FOR ADMISSION NO. 669

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with crepes at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 670

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with crepes at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 671

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with crepes.

REQUEST FOR ADMISSION NO. 672

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with crepes.

REQUEST FOR ADMISSION NO. 673

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with crepes.

REQUEST FOR ADMISSION NO. 674

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with crepes.

REQUEST FOR ADMISSION NO. 675

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with croissants at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 676

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with croissants at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 677

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with croissants.

REQUEST FOR ADMISSION NO. 678

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with croissants.

REQUEST FOR ADMISSION NO. 679

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with croissants.

REQUEST FOR ADMISSION NO. 680

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with croissants.

REQUEST FOR ADMISSION NO. 681

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with flavoring syrup at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 682

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with flavoring syrup at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 683

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with flavoring syrup.

REQUEST FOR ADMISSION NO. 684

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with flavoring syrup.

REQUEST FOR ADMISSION NO. 685

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with flavoring syrup.

REQUEST FOR ADMISSION NO. 686

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with flavoring syrup.

REQUEST FOR ADMISSION NO. 687

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with frozen juice bars at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 688

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with frozen juice bars at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 689

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with frozen juice bars.

REQUEST FOR ADMISSION NO. 690

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with frozen juice bars.

REQUEST FOR ADMISSION NO. 691

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with frozen juice bars.

REQUEST FOR ADMISSION NO. 692

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with frozen juice bars.

REQUEST FOR ADMISSION NO. 693

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with frozen yogurt at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 694

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with frozen yogurt at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 695

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with frozen yogurt.

REQUEST FOR ADMISSION NO. 696

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with frozen yogurt.

REQUEST FOR ADMISSION NO. 697

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with frozen yogurt.

REQUEST FOR ADMISSION NO. 698

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with frozen yogurt.

REQUEST FOR ADMISSION NO. 699

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with frozen yogurt mixes at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 700

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with frozen yogurt mixes at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 701

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with frozen yogurt mixes.

REQUEST FOR ADMISSION NO. 702

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with frozen yogurt mixes.

REQUEST FOR ADMISSION NO. 703

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with frozen yogurt mixes.

REQUEST FOR ADMISSION NO. 704

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with frozen yogurt mixes.

REQUEST FOR ADMISSION NO. 705

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with garlic powder at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 706

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with garlic powder at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 707

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with garlic powder.

REQUEST FOR ADMISSION NO. 708

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with garlic powder.

REQUEST FOR ADMISSION NO. 709

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with garlic powder.

REQUEST FOR ADMISSION NO. 710

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with garlic powder.

REQUEST FOR ADMISSION NO. 711

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with ice at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 712

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with ice at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 713

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with ice.

REQUEST FOR ADMISSION NO. 714

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with ice.

REQUEST FOR ADMISSION NO. 715

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with ice.

REQUEST FOR ADMISSION NO. 716

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with ice.

REQUEST FOR ADMISSION NO. 717

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with ice cream at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 718

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with ice cream at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 719

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with ice cream.

REQUEST FOR ADMISSION NO. 720

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with ice cream.

REQUEST FOR ADMISSION NO. 721

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with ice cream.

REQUEST FOR ADMISSION NO. 722

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with ice cream.

REQUEST FOR ADMISSION NO. 723

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with ice cubes at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 724

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with ice cubes at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 725

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with ice cubes.

REQUEST FOR ADMISSION NO. 726

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with ice cubes.

REQUEST FOR ADMISSION NO. 727

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with ice cubes.

REQUEST FOR ADMISSION NO. 728

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with ice cubes.

REQUEST FOR ADMISSION NO. 729

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with noodles at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 730

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with noodles at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 731

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with noodles.

REQUEST FOR ADMISSION NO. 732

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with noodles.

REQUEST FOR ADMISSION NO. 733

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with noodles.

REQUEST FOR ADMISSION NO. 734

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with noodles.

REQUEST FOR ADMISSION NO. 735

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with oat flakes at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 736

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with oat flakes at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 737

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with oat flakes.

REQUEST FOR ADMISSION NO. 738

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with oat flakes.

REQUEST FOR ADMISSION NO. 739

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with oat flakes.

REQUEST FOR ADMISSION NO. 740

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with oat flakes.

REQUEST FOR ADMISSION NO. 741

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with processed oats at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 742

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with processed oats at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 743

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with processed oats.

REQUEST FOR ADMISSION NO. 744

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with processed oats.

REQUEST FOR ADMISSION NO. 745

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with processed oats.

REQUEST FOR ADMISSION NO. 746

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with processed oats.

REQUEST FOR ADMISSION NO. 747

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with rice at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 748

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with rice at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 749

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with rice.

REQUEST FOR ADMISSION NO. 750

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with rice.

REQUEST FOR ADMISSION NO. 751

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with rice.

REQUEST FOR ADMISSION NO. 752

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with rice.

REQUEST FOR ADMISSION NO. 753

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with salad dressings at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 754

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with salad dressings at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 755

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with salad dressings.

REQUEST FOR ADMISSION NO. 756

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with salad dressings.

REQUEST FOR ADMISSION NO. 757

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with salad dressings.

REQUEST FOR ADMISSION NO. 758

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with salad dressings.

REQUEST FOR ADMISSION NO. 759

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with salsa at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 760

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with salsa at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 761

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with salsa.

REQUEST FOR ADMISSION NO. 762

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with salsa.

REQUEST FOR ADMISSION NO. 763

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with salsa.

REQUEST FOR ADMISSION NO. 764

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with salsa.

REQUEST FOR ADMISSION NO. 765

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with sandwiches at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 766

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with sandwiches at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 767

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with sandwiches.

REQUEST FOR ADMISSION NO. 768

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with sandwiches.

REQUEST FOR ADMISSION NO. 769

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with sandwiches.

REQUEST FOR ADMISSION NO. 770

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with sandwiches.

REQUEST FOR ADMISSION NO. 771

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with hamburger sandwiches at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 772

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with hamburger sandwiches at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 773

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with hamburger sandwiches.

REQUEST FOR ADMISSION NO. 774

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with hamburger sandwiches.

REQUEST FOR ADMISSION NO. 775

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with hamburger sandwiches.

REQUEST FOR ADMISSION NO. 776

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with hamburger sandwiches.

REQUEST FOR ADMISSION NO. 777

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with toast at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 778

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with toast at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 779

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with toast.

REQUEST FOR ADMISSION NO. 780

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with toast.

REQUEST FOR ADMISSION NO. 781

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with toast.

REQUEST FOR ADMISSION NO. 782

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with toast.

REQUEST FOR ADMISSION NO. 783

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with sauces at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 784

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with sauces at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 785

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with sauces.

REQUEST FOR ADMISSION NO. 786

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with sauces.

REQUEST FOR ADMISSION NO. 787

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with sauces.

REQUEST FOR ADMISSION NO. 788

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with sauces.

REQUEST FOR ADMISSION NO. 789

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with sauce mixes at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 790

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with sauce mixes at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 791

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with sauce mixes.

REQUEST FOR ADMISSION NO. 792

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with sauce mixes.

REQUEST FOR ADMISSION NO. 793

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with sauce mixes.

REQUEST FOR ADMISSION NO. 794

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with sauce mixes.

REQUEST FOR ADMISSION NO. 795

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with condiment, namely, pepper sauce at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 796

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with condiment, namely, pepper sauce at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 797

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with condiment, namely, pepper sauce.

REQUEST FOR ADMISSION NO. 798

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with condiment, namely, pepper sauce.

REQUEST FOR ADMISSION NO. 799

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with condiment, namely, pepper sauce.

REQUEST FOR ADMISSION NO. 800

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with condiment, namely, pepper sauce.

REQUEST FOR ADMISSION NO. 801

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with teriyaki sauce at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 802

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with teriyaki sauce at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 803

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with teriyaki sauce.

REQUEST FOR ADMISSION NO. 804

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with teriyaki sauce.

REQUEST FOR ADMISSION NO. 805

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with teriyaki sauce.

REQUEST FOR ADMISSION NO. 806

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with teriyaki sauce.

REQUEST FOR ADMISSION NO. 807

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with tomato sauce at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 808

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with tomato sauce.

REQUEST FOR ADMISSION NO. 809

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with tomato sauce.

REQUEST FOR ADMISSION NO. 810

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with tortillas at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 811

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with tortillas.

REQUEST FOR ADMISSION NO. 812

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with tortillas.

REQUEST FOR ADMISSION NO. 813

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with oatmeal at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 814

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with oatmeal.

REQUEST FOR ADMISSION NO. 815

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with oatmeal.

REQUEST FOR ADMISSION NO. 816

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with aerated fruit juices at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 817

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with aerated fruit juices at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 818

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with aerated fruit juices.

REQUEST FOR ADMISSION NO. 819

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with aerated fruit juices.

REQUEST FOR ADMISSION NO. 820

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with aerated fruit juices.

REQUEST FOR ADMISSION NO. 821

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with aerated fruit juices.

REQUEST FOR ADMISSION NO. 822

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with aerated mineral waters at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 823

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with aerated mineral waters at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 824

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with aerated mineral waters.

REQUEST FOR ADMISSION NO. 825

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with aerated mineral waters.

REQUEST FOR ADMISSION NO. 826

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with aerated mineral waters.

REQUEST FOR ADMISSION NO. 827

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with aerated mineral waters.

REQUEST FOR ADMISSION NO. 828

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with aerated water at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 829

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with aerated water at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 830

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with aerated water.

REQUEST FOR ADMISSION NO. 831

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with aerated water.

REQUEST FOR ADMISSION NO. 832

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with aerated water.

REQUEST FOR ADMISSION NO. 833

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with aerated water.

REQUEST FOR ADMISSION NO. 834

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with apple juice beverages at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 835

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with apple juice beverages at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 836

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with apple juice beverages.

REQUEST FOR ADMISSION NO. 837

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with apple juice beverages.

REQUEST FOR ADMISSION NO. 838

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with apple juice beverages.

REQUEST FOR ADMISSION NO. 839

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with apple juice beverages.

REQUEST FOR ADMISSION NO. 840

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with beers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 841

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with beers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 842

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with beers.

REQUEST FOR ADMISSION NO. 843

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with beers.

REQUEST FOR ADMISSION NO. 844

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with beers.

REQUEST FOR ADMISSION NO. 845

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with beers.

REQUEST FOR ADMISSION NO. 846

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with ale at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 847

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with ale at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 848

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with ale.

REQUEST FOR ADMISSION NO. 849

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with ale.

REQUEST FOR ADMISSION NO. 850

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with ale.

REQUEST FOR ADMISSION NO. 851

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with ale.

REQUEST FOR ADMISSION NO. 852

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with lager at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 853

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with lager at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 854

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with lager.

REQUEST FOR ADMISSION NO. 855

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with lager.

REQUEST FOR ADMISSION NO. 856

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with lager.

REQUEST FOR ADMISSION NO. 857

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with lager.

REQUEST FOR ADMISSION NO. 858

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with stout at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 859

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with stout at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 860

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with stout.

REQUEST FOR ADMISSION NO. 861

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with stout.

REQUEST FOR ADMISSION NO. 862

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with stout.

REQUEST FOR ADMISSION NO. 863

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with stout.

REQUEST FOR ADMISSION NO. 864

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with porter at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 865

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with porter at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 866

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with porter.

REQUEST FOR ADMISSION NO. 867

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with porter.

REQUEST FOR ADMISSION NO. 868

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with porter.

REQUEST FOR ADMISSION NO. 869

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with porter.

REQUEST FOR ADMISSION NO. 870

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with shandy at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 871

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with shandy at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 872

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with shandy.

REQUEST FOR ADMISSION NO. 873

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with shandy.

REQUEST FOR ADMISSION NO. 874

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with shandy.

REQUEST FOR ADMISSION NO. 875

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with shandy.

REQUEST FOR ADMISSION NO. 876

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with bottled artesian water at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 877

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with bottled artesian water at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 878

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with bottled artesian water.

REQUEST FOR ADMISSION NO. 879

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with bottled artesian water.

REQUEST FOR ADMISSION NO. 880

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with bottled artesian water.

REQUEST FOR ADMISSION NO. 881

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with bottled artesian water.

REQUEST FOR ADMISSION NO. 882

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with bottled water at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 883

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with bottled water at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 884

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with bottled water.

REQUEST FOR ADMISSION NO. 885

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with bottled water.

REQUEST FOR ADMISSION NO. 886

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with bottled water.

REQUEST FOR ADMISSION NO. 887

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with bottled water.

REQUEST FOR ADMISSION NO. 888

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with carbonated waters at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 889

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with carbonated waters at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 890

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with carbonated waters.

REQUEST FOR ADMISSION NO. 891

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with carbonated waters.

REQUEST FOR ADMISSION NO. 892

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with carbonated waters.

REQUEST FOR ADMISSION NO. 893

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with carbonated waters.

REQUEST FOR ADMISSION NO. 894

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coconut-based beverages at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 895

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with coconut-based beverages not being milk substitutes at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 896

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coconut-based beverages.

REQUEST FOR ADMISSION NO. 897

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with coconut-based beverages not being milk substitutes.

REQUEST FOR ADMISSION NO. 898

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coconut-based beverages.

REQUEST FOR ADMISSION NO. 899

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with coconut-based beverages not being milk substitutes.

REQUEST FOR ADMISSION NO. 900

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee-flavored beer at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 901

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with coffee-flavored beer at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 902

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee-flavored beer.

REQUEST FOR ADMISSION NO. 903

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with coffee-flavored beer.

REQUEST FOR ADMISSION NO. 904

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee-flavored beer.

REQUEST FOR ADMISSION NO. 905

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with coffee-flavored beer.

REQUEST FOR ADMISSION NO. 906

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee-flavored soft drink at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 907

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with coffee-flavored soft drink at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 908

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee-flavored soft drink.

REQUEST FOR ADMISSION NO. 909

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with coffee-flavored soft drink.

REQUEST FOR ADMISSION NO. 910

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee-flavored soft drink.

REQUEST FOR ADMISSION NO. 911

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with coffee-flavored soft drink.

REQUEST FOR ADMISSION NO. 912

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with cola drinks at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 913

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with cola drinks at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 914

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with cola drinks.

REQUEST FOR ADMISSION NO. 915

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with cola drinks.

REQUEST FOR ADMISSION NO. 916

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with cola drinks.

REQUEST FOR ADMISSION NO. 917

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with cola drinks.

REQUEST FOR ADMISSION NO. 918

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with drinking water with vitamins at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 919

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with drinking water with vitamins at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 920

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with drinking water with vitamins.

REQUEST FOR ADMISSION NO. 921

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with drinking water with vitamins.

REQUEST FOR ADMISSION NO. 922

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with drinking water with vitamins.

REQUEST FOR ADMISSION NO. 923

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with drinking water with vitamins.

REQUEST FOR ADMISSION NO. 924

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with flavored beers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 925

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with flavored beers at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 926

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with flavored beers.

REQUEST FOR ADMISSION NO. 927

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with flavored beers.

REQUEST FOR ADMISSION NO. 928

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with flavored beers.

REQUEST FOR ADMISSION NO. 929

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with flavored beers.

REQUEST FOR ADMISSION NO. 930

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with flavored enhanced water at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 931

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with flavored enhanced water at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 932

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with flavored enhanced water.

REQUEST FOR ADMISSION NO. 933

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with flavored enhanced water.

REQUEST FOR ADMISSION NO. 934

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with flavored enhanced water.

REQUEST FOR ADMISSION NO. 935

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with flavored enhanced water.

REQUEST FOR ADMISSION NO. 936

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with frozen fruit beverages at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 937

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with frozen fruit beverages at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 938

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with frozen fruit beverages.

REQUEST FOR ADMISSION NO. 939

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with frozen fruit beverages.

REQUEST FOR ADMISSION NO. 940

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with frozen fruit beverages.

REQUEST FOR ADMISSION NO. 941

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with frozen fruit beverages.

REQUEST FOR ADMISSION NO. 942

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with fruit juices at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 943

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with fruit juices at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 944

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with fruit juices.

REQUEST FOR ADMISSION NO. 945

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with fruit juices.

REQUEST FOR ADMISSION NO. 946

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with fruit juices.

REQUEST FOR ADMISSION NO. 947

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with fruit juices.

REQUEST FOR ADMISSION NO. 948

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with fruit juice bases at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 949

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with fruit juice bases at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 950

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with fruit juice bases.

REQUEST FOR ADMISSION NO. 951

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with fruit juice bases.

REQUEST FOR ADMISSION NO. 952

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with fruit juice bases.

REQUEST FOR ADMISSION NO. 953

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with fruit juice bases.

REQUEST FOR ADMISSION NO. 954

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with lemonade at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 955

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with lemonade at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 956

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with lemonade.

REQUEST FOR ADMISSION NO. 957

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with lemonade.

REQUEST FOR ADMISSION NO. 958

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with lemonade.

REQUEST FOR ADMISSION NO. 959

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with lemonade.

REQUEST FOR ADMISSION NO. 960

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with malt beer at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 961

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with malt beer at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 962

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with malt beer.

REQUEST FOR ADMISSION NO. 963

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with malt beer.

REQUEST FOR ADMISSION NO. 964

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with malt beer.

REQUEST FOR ADMISSION NO. 965

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with malt beer.

REQUEST FOR ADMISSION NO. 966

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with non-alcoholic beverages, namely, carbonated beverages at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 967

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with non-alcoholic beverages, namely, carbonated beverages at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 968

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with non-alcoholic beverages, namely, carbonated beverages.

REQUEST FOR ADMISSION NO. 969

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with non-alcoholic beverages, namely, carbonated beverages.

REQUEST FOR ADMISSION NO. 970

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with non-alcoholic beverages, namely, carbonated beverages.

REQUEST FOR ADMISSION NO. 971

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with non-alcoholic beverages, namely, carbonated beverages.

REQUEST FOR ADMISSION NO. 972

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with non-alcoholic cocktails at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 973

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with non-alcoholic cocktails at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 974

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with non-alcoholic cocktails.

REQUEST FOR ADMISSION NO. 975

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with non-alcoholic cocktails.

REQUEST FOR ADMISSION NO. 976

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with non-alcoholic cocktails.

REQUEST FOR ADMISSION NO. 977

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with non-alcoholic cocktails.

REQUEST FOR ADMISSION NO. 978

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with orange juice at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 979

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with orange juice at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 980

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with orange juice.

REQUEST FOR ADMISSION NO. 981

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with orange juice.

REQUEST FOR ADMISSION NO. 982

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with orange juice.

REQUEST FOR ADMISSION NO. 983

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with orange juice.

REQUEST FOR ADMISSION NO. 984

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with smoothies at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 985

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with smoothies at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 986

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with smoothies.

REQUEST FOR ADMISSION NO. 987

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with smoothies.

REQUEST FOR ADMISSION NO. 988

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with smoothies.

REQUEST FOR ADMISSION NO. 989

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with smoothies.

REQUEST FOR ADMISSION NO. 990

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with sparkling water at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 991

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with sparkling water at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 992

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with sparkling water.

REQUEST FOR ADMISSION NO. 993

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with sparkling water.

REQUEST FOR ADMISSION NO. 994

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with sparkling water.

REQUEST FOR ADMISSION NO. 995

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with sparkling water.

REQUEST FOR ADMISSION NO. 996

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with still waters at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 997

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with still waters at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 998

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with still waters.

REQUEST FOR ADMISSION NO. 999

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with still waters.

REQUEST FOR ADMISSION NO. 1000

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with still waters.

REQUEST FOR ADMISSION NO. 1001

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with still waters.

REQUEST FOR ADMISSION NO. 1002

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with vegetable drinks at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1003

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with vegetable drinks at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1004

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with vegetable drinks.

REQUEST FOR ADMISSION NO. 1005

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with vegetable drinks.

REQUEST FOR ADMISSION NO. 1006

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with vegetable drinks.

REQUEST FOR ADMISSION NO. 1007

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with vegetable drinks.

REQUEST FOR ADMISSION NO. 1008

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with alcoholic beverages of fruit at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1009

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with alcoholic beverages of fruit at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1010

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with alcoholic beverages of fruit.

REQUEST FOR ADMISSION NO. 1011

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with alcoholic beverages of fruit.

REQUEST FOR ADMISSION NO. 1012

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with alcoholic beverages of fruit.

REQUEST FOR ADMISSION NO. 1013

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with alcoholic beverages of fruit.

REQUEST FOR ADMISSION NO. 1014

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with alcoholic cocktail mixes at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1015

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with alcoholic cocktail mixes at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1016

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with alcoholic cocktail mixes.

REQUEST FOR ADMISSION NO. 1017

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with alcoholic cocktail mixes.

REQUEST FOR ADMISSION NO. 1018

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with alcoholic cocktail mixes.

REQUEST FOR ADMISSION NO. 1019

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with alcoholic cocktail mixes.

REQUEST FOR ADMISSION NO. 1020

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with blended spirits at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1021

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with blended spirits at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1022

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with blended spirits.

REQUEST FOR ADMISSION NO. 1023

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with blended spirits.

REQUEST FOR ADMISSION NO. 1024

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with blended spirits.

REQUEST FOR ADMISSION NO. 1025

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with blended spirits.

REQUEST FOR ADMISSION NO. 1026

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with brandy at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1027

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with brandy at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1028

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with brandy.

REQUEST FOR ADMISSION NO. 1029

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with brandy.

REQUEST FOR ADMISSION NO. 1030

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with brandy.

REQUEST FOR ADMISSION NO. 1031

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with brandy.

REQUEST FOR ADMISSION NO. 1032

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with champagne at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1033

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with champagne at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1034

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with champagne.

REQUEST FOR ADMISSION NO. 1035

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with champagne.

REQUEST FOR ADMISSION NO. 1036

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with champagne.

REQUEST FOR ADMISSION NO. 1037

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with champagne.

REQUEST FOR ADMISSION NO. 1038

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee-based liqueurs at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1039

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with coffee-based liqueurs at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1040

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee-based liqueurs.

REQUEST FOR ADMISSION NO. 1041

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with coffee-based liqueurs.

REQUEST FOR ADMISSION NO. 1042

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee-based liqueurs.

REQUEST FOR ADMISSION NO. 1043

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with coffee-based liqueurs.

REQUEST FOR ADMISSION NO. 1044

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with gin at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1045

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with gin at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1046

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with gin.

REQUEST FOR ADMISSION NO. 1047

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with gin.

REQUEST FOR ADMISSION NO. 1048

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with gin.

REQUEST FOR ADMISSION NO. 1049

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with gin.

REQUEST FOR ADMISSION NO. 1050

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with grape wine at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1051

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with grape wine at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1052

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with grape wine.

REQUEST FOR ADMISSION NO. 1053

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with grape wine.

REQUEST FOR ADMISSION NO. 1054

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with grape wine.

REQUEST FOR ADMISSION NO. 1055

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with grape wine.

REQUEST FOR ADMISSION NO. 1056

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with irish [sic] whiskey at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1057

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with irish [sic] whiskey at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1058

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with irish [sic] whiskey.

REQUEST FOR ADMISSION NO. 1059

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with irish [sic] whiskey.

REQUEST FOR ADMISSION NO. 1060

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with irish [sic] whiskey.

REQUEST FOR ADMISSION NO. 1061

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with irish [sic] whiskey.

REQUEST FOR ADMISSION NO. 1062

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with malt whisky at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1063

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with malt whisky at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1064

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with malt whisky.

REQUEST FOR ADMISSION NO. 1065

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with malt whisky.

REQUEST FOR ADMISSION NO. 1066

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with malt whisky.

REQUEST FOR ADMISSION NO. 1067

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with malt whisky.

REQUEST FOR ADMISSION NO. 1068

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with sparkling wines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1069

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with sparkling wines at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1070

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with sparkling wines.

REQUEST FOR ADMISSION NO. 1071

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with sparkling wines.

REQUEST FOR ADMISSION NO. 1072

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with sparkling wines.

REQUEST FOR ADMISSION NO. 1073

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with sparkling wines.

REQUEST FOR ADMISSION NO. 1074

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with red wines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1075

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with red wines at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1076

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with red wines.

REQUEST FOR ADMISSION NO. 1077

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with red wines.

REQUEST FOR ADMISSION NO. 1078

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with red wines.

REQUEST FOR ADMISSION NO. 1079

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with red wines.

REQUEST FOR ADMISSION NO. 1080

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with rum at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1081

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with rum at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1082

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with rum.

REQUEST FOR ADMISSION NO. 1083

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with rum.

REQUEST FOR ADMISSION NO. 1084

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with rum.

REQUEST FOR ADMISSION NO. 1085

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with rum.

REQUEST FOR ADMISSION NO. 1086

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with sake at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1087

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with sake at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1088

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with sake.

REQUEST FOR ADMISSION NO. 1089

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with sake.

REQUEST FOR ADMISSION NO. 1090

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with sake.

REQUEST FOR ADMISSION NO. 1091

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with sake.

REQUEST FOR ADMISSION NO. 1092

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with scotch at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1093

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with scotch at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1094

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with scotch.

REQUEST FOR ADMISSION NO. 1095

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with scotch.

REQUEST FOR ADMISSION NO. 1096

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with scotch.

REQUEST FOR ADMISSION NO. 1097

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with scotch.

REQUEST FOR ADMISSION NO. 1098

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with vodka at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1099

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with vodka at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1100

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with vodka.

REQUEST FOR ADMISSION NO. 1101

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with vodka.

REQUEST FOR ADMISSION NO. 1102

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with vodka.

REQUEST FOR ADMISSION NO. 1103

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with vodka.

REQUEST FOR ADMISSION NO. 1104

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with whiskey at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1105

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with whiskey at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1106

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with whiskey.

REQUEST FOR ADMISSION NO. 1107

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with whiskey.

REQUEST FOR ADMISSION NO. 1108

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with whiskey.

REQUEST FOR ADMISSION NO. 1109

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with whiskey.

REQUEST FOR ADMISSION NO. 1110

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with whisky at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1111

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with whisky at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1112

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with whisky.

REQUEST FOR ADMISSION NO. 1113

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with whisky.

REQUEST FOR ADMISSION NO. 1114

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with whisky.

REQUEST FOR ADMISSION NO. 1115

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with whisky.

REQUEST FOR ADMISSION NO. 1116

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with white wine at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1117

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with white wine at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1118

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with white wine.

REQUEST FOR ADMISSION NO. 1119

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with white wine.

REQUEST FOR ADMISSION NO. 1120

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with white wine.

REQUEST FOR ADMISSION NO. 1121

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with white wine.

REQUEST FOR ADMISSION NO. 1122

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with wines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1123

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with wines at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1124

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with wines.

REQUEST FOR ADMISSION NO. 1125

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with wines.

REQUEST FOR ADMISSION NO. 1126

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with wines.

REQUEST FOR ADMISSION NO. 1127

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with wines.

REQUEST FOR ADMISSION NO. 1128

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with wine-based drinks at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1129

Applicant did not have a bona fide intent to use Applicant's '820 Mark in commerce on or in connection with wine-based drinks at the time of filing U.S. Appln. No. 85/969,820.

REQUEST FOR ADMISSION NO. 1130

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with wine-based drinks.

REQUEST FOR ADMISSION NO. 1131

Applicant has not commenced use in commerce of Applicant's '820 Mark on or in connection with wine-based drinks.

REQUEST FOR ADMISSION NO. 1132

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with wine-based drinks.

REQUEST FOR ADMISSION NO. 1133

Applicant did not at anytime take specific steps or actions to make use of Applicant's '820 Mark in commerce on or in connection with wine-based drinks.

REQUEST FOR ADMISSION NO. 1134

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with restaurant services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1135

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with restaurant services.

REQUEST FOR ADMISSION NO. 1136

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with restaurant services.

REQUEST FOR ADMISSION NO. 1137

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with bar services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1138

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with bar services.

REQUEST FOR ADMISSION NO. 1139

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with bar services.

REQUEST FOR ADMISSION NO. 1140

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with café services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1141

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with café services.

REQUEST FOR ADMISSION NO. 1142

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with café services.

REQUEST FOR ADMISSION NO. 1143

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with cocktail lounge services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1144

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with cocktail lounge services.

REQUEST FOR ADMISSION NO. 1145

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with cocktail lounge services.

REQUEST FOR ADMISSION NO. 1146

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee bars at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1147

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee bars.

REQUEST FOR ADMISSION NO. 1148

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee bars.

REQUEST FOR ADMISSION NO. 1149

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee shops at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1150

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee shops.

REQUEST FOR ADMISSION NO. 1151

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee shops.

REQUEST FOR ADMISSION NO. 1152

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with coffee supply services for offices at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1153

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with coffee supply services for offices.

REQUEST FOR ADMISSION NO. 1154

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with coffee supply services for offices.

REQUEST FOR ADMISSION NO. 1155

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with contract food services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1156

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with contract food services.

REQUEST FOR ADMISSION NO. 1157

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with contract food services.

REQUEST FOR ADMISSION NO. 1158

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with fast-food restaurant services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1159

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with fast-food restaurant services.

REQUEST FOR ADMISSION NO. 1160

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with fast-food restaurant services.

REQUEST FOR ADMISSION NO. 1161

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with frozen yogurt shop services in the nature of a restaurant at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1162

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with frozen yogurt shop services in the nature of a restaurant.

REQUEST FOR ADMISSION NO. 1163

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with frozen yogurt shop services in the nature of a restaurant.

REQUEST FOR ADMISSION NO. 1164

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with mobile restaurant services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1165

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with mobile restaurant services.

REQUEST FOR ADMISSION NO. 1166

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with mobile restaurant services.

REQUEST FOR ADMISSION NO. 1167

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with rental of drink dispensing machines at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1168

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with rental of drink dispensing machines.

REQUEST FOR ADMISSION NO. 1169

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with rental of drink dispensing machines.

REQUEST FOR ADMISSION NO. 1170

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with rental of drinking water dispensers at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1171

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with rental of drinking water dispensers.

REQUEST FOR ADMISSION NO. 1172

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with rental of drinking water dispensers.

REQUEST FOR ADMISSION NO. 1173

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with restaurant and café services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1174

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with restaurant and café services.

REQUEST FOR ADMISSION NO. 1175

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with restaurant and café services.

REQUEST FOR ADMISSION NO. 1176

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with wine bars at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1177

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with wine bars.

REQUEST FOR ADMISSION NO. 1178

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with wine bars.

REQUEST FOR ADMISSION NO. 1179

Applicant did not have a bona fide intent to use Applicant's '816 Mark in commerce on or in connection with take-out restaurant services at the time of filing U.S. Appln. No. 85/680,816.

REQUEST FOR ADMISSION NO. 1180

Applicant has not commenced use in commerce of Applicant's '816 Mark on or in connection with take-out restaurant services.

REQUEST FOR ADMISSION NO. 1181

Applicant did not at anytime take specific steps or actions to make use of Applicant's '816 Mark in commerce on or in connection with take-out restaurant services.

REQUEST FOR ADMISSION NO. 1182

The goods on which Applicant asserts a bona fide intent-to-use Applicant's '816 Mark are identical or substantially similar to Opposer's goods under Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1183

The goods on which Applicant asserts a bona fide intent-to-use Applicant's '820 Mark are identical or substantially similar to Opposer's goods under Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1184

Applicant's '816 Mark creates the same overall commercial impression as Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1185

Applicant's '820 Mark creates the same overall commercial impression as Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1186

The goods on which Applicant asserts a bona fide intent to use of Applicant's '816 Mark are intended to be advertised and promoted to the same purchasers as Opposer's goods under Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1187

The goods on which Applicant asserts a bona fide intent to use Applicant's '820 Mark are intended to be advertised and promoted to the same purchasers as Opposer's goods under Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1188

The goods on which Applicant asserts a bona fide intent to use Applicant's '816 Mark are intended to be directed at the same trade channels as Opposer's goods under Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1189

The goods on which Applicant asserts a bona fide intent to use Applicant's '820 Mark are intended to be directed at the same trade channels as Opposer's goods under Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1190

There is a likelihood of confusion between Applicant's '816 Mark and Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1191

There is a likelihood of confusion between Applicant's '820 Mark and Red Bull's RED BULL and Bull Logo Marks.

REQUEST FOR ADMISSION NO. 1192

Simultaneous use of Applicant's '816 Mark and Red Bull's RED BULL and Bull Logo Marks is likely to cause confusion, mistake, and/or deception among customers, users, and/or the public as to the source of each mark's respective goods.

REQUEST FOR ADMISSION NO. 1193

Simultaneous use of Applicant's '820 Mark and Red Bull's RED BULL and Bull Logo Marks is likely to cause confusion, mistake, and/or deception among customers, users, and/or the public as to the source of each mark's respective goods.

Respectfully submitted,

RED BULL GMBH  
By: /Martin R. Greenstein/  
Martin R. Greenstein  
Leah Z. Halpert  
Angelique M. Riordan  
TechMark a Law Corporation  
4820 Harwood Road, 2nd Floor  
San Jose, CA 95124-5273  
Tel: 408- 266-4700 Fax: 408-850-1955  
E-Mail: MRG@TechMark.com  
Attorneys for Opposer

Dated: May 23, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **OPPOSER'S FIRST SET OF REQUESTS FOR ADMISSION TO APPLICANT** is being served on May 23, 2014, by first class mail, postage prepaid on Applicant's Correspondent of Record at the Correspondent's address of record below:

Paulo A. de Almeida  
Patel & Almeida, P.C.  
16830 Ventura Blvd, Suite 360  
Encino, CA 91436

/Leah Z. Halpert/  
Leah Z. Halpert

# Exhibit B

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

RED BULL GMBH,	)	
	)	
Opposer,	)	Consolidated Opposition No.: 91210282
	)	Opposition No. 91210282
	)	Opposition No. 91214537
v.	)	
	)	Serial Nos. 85680816, 85969820
	)	Mark: STOCKMARKET, Bull and Swirl
STOCKMARKET BURGER, INC.,	)	Design
Applicant.	)	
	)	
	)	
	)	
	)	

---

**APPLICANT'S RESPONSES TO OPPOSER'S INTERROGATORIES**

PROPOUNDING PARTY: RED BULL GMBH  
RESPONDING PARTY: STOCKMARKET BURGER, INC.  
SET NUMBER: ONE

Pursuant to Federal Rules of Civil Procedure, Applicant STOCKMARKET BURGER, INC. (hereinafter, "Applicant") hereby provides its Responses to Opposer, RED BULL GMBH's (hereinafter, "Opposer") INTERROGATORIES. Set One, as follows:

**RESPONSES**

1. Identify all individuals who have knowledge about the intended use, marketing, advertising and/or promotion of Applicant's '816 Mark and Applicant's '820 Mark on the goods and services set forth in their respective application.

**RESPONSE:**

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks

information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

2. Explain the process through which Applicant conceived, cleared and adopted Applicant's '816 Mark and Applicant's '820 Mark in connection with the goods and services set forth in their respective applications, and identify the person(s) involved with or knowledgeable about this process.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or

confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

3. Explain in detail each and every product and service intended to be offered or marketing by Applicant under Applicant's '816 Mark and Applicant's '820 Mark.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

4. Explain how Applicant's '816 Mark and Applicant's 820 Mark are intended to be used in connection with each of the goods and services identified in their respective applications.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

5. Identify the intended target consumers market for each product or service marketed, advertised, promoted, offered for sale and/or sold/rendered under Applicant's '816 Mark and Applicant's '820 Mark.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of

admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

6. Describe in detail the manner in which the products and services identified in the applications for Applicant's '816 Mark and Applicant's '820 Mark are intended to be distributed/rendered to the ultimate consumers.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is

currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

7. Explain the origin of Applicant's '816 Mark and Applicant's '820 Mark, including why the design of a bull was used.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

8. Explain the color in which Applicant's '816 Mark and Applicant's '820 Mark are intended to be, or are used, and explain how the color was chosen.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

9. Identify any other trademarks Applicant considered adopting in connection with any of the products and services set forth in U.S. Application No. 85/680,816, and explain why Applicant's '816 Mark was chosen.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects

to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

10. Identify any other trademarks Applicant considered adopting in connection with any of the products and services set forth in U.S. Application No. 85/969,820, and explain why Applicant's '820 Mark was chosen.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

11. Describe all efforts, plans, and actions taken by Applicant to begin use of Applicant's '816 Mark.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

12. Describe all efforts, plans, and actions taken by Applicant to begin use of Applicant's '820 Mark.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of

admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

13. Describe all negotiations and agreements relating to steps taken in preparation for the intended use of Applicant's '816 Mark, including but not limited to those relating to or involving contracts for goods or services, license agreements, proposals, bids, or any other discussion relating to the intended use of Applicant's '816 Mark.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy

under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

14. Describe all negotiations and agreements relating to steps taken in preparation for the intended use of Applicant's '820 Mark, including but not limited to those relating to or involving contracts for goods or services, license agreements, proposals, bids, or any other discussion relating to the intended use of Applicant's '820 Mark.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

15. Describe Applicant's document retention policy, including steps Applicant has taken to preserve the documents that may be relevant to this proceeding.

RESPONSE:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

Respectfully submitted,

Dated as of: December 24, 2014

By:           /Tianjiao Gu/            
Stockmarket Burger, Inc.  
13603 Marina Pointe Drive. C520  
Marina Del Rey, CA 90292  
(714)262-3549

**PROOF OF SERVICE**

I hereby certify that a true and complete copy of the foregoing **APPLICANT'S RESPONSES TO INTERROGATORIES** has been served on Martin R. Greenstein, counsel for Opposer, on December 24, 2014, via First Class U.S. Mail, postage prepaid to:

Martin R. Greenstein  
TechMark a Law Corporation  
4820 Harwood Road, 2nd Floor  
San Jose, CA 95124-5273

By: /Tianjiao Gu/  
Tianjiao Gu

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

RED BULL GMBH,	)	
	)	
Opposer,	)	Consolidated Opposition No.: 91210282
	)	Opposition No. 91210282
	)	Opposition No. 91214537
v.	)	
	)	Serial Nos. 85680816, 85969820
	)	Mark: STOCKMARKET, Bull and Swirl
STOCKMARKET BURGER, INC.,	)	Design
Applicant.	)	
	)	
	)	
	)	
	)	

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**APPLICANT'S RESPONSES TO OPPOSER'S**

**REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS**

PROPOUNDING PARTY: RED BULL GMBH  
RESPONDING PARTY: STOCKMARKET BURGER, INC.  
SET NUMBER: ONE

Pursuant to Federal Rules of Civil Procedure, Applicant STOCKMARKET BURGER, INC. (hereinafter, "Applicant") hereby provides its Responses to Opposer, RED BULL GMBH's (hereinafter, "Opposer") Request for Production of Documents and Things. Set One, as follows:

**RESPONSES**

1. Specimens sufficient to show current and past advertising and promotional campaigns bearing Applicant's '816 Mark in any medium, including, but not limited to, journals, catalogues, circulars, leaflets, direct mail pieces newspaper and magazine advertisements, telephone book advertisements, press releases and electronic media, created or used by Applicant.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

2. Specimens sufficient to show current and past advertising and promotional campaigns bearing Applicant's '820 Mark in any medium, including, but not limited to, journals, catalogues, circulars, leaflets, direct mail pieces newspaper and magazine advertisements, telephone book advertisements, press releases and electronic media, created or used by Applicant.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly

outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

3. Documents sufficient to show Applicant's current and planned labels and packaging that may ultimately be seen by consumers bearing Applicant's '816 Mark, including, prototypes and/or drafts and sketches for said labels and packaging.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially

dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

4. Documents sufficient to show Applicant's current and planned labels and packaging that may ultimately be seen by consumers bearing Applicant's '820 Mark, including, prototypes and/or drafts and sketches for said labels and packaging.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

5. Documents and things sufficient to show the creation, selection, and adoption process by You of Applicant's '816 Mark and why the bull design was chosen, including any documents and correspondence from any third party graphic designer or ad agency who created the mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

6. Documents and things sufficient to show the creation, selection, and adoption process by You of Applicant's '820 Mark and why the bull design was chosen, including any documents and correspondence from any third party graphic designer or ad agency who created the mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly

outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

7. Documents sufficient to identify each person, including, but not limited to, employees of Applicant and its affiliates, involved in the decision to adopt, use and/or seek trademark registration protection for Applicant's '816 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially

dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

8. Documents sufficient to identify each person, including, but not limited to, employees of Applicant and its affiliates, involved in the decision to adopt, use and/or seek trademark registration protection for Applicant's '820 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

9. Documents concerning any investigations to use or apply to register Applicant's '816 Mark, including, but not limited to clearance and investigative searches for service marks, trademarks, trade names, or corporate names.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

10. Documents concerning any investigations to use or apply to register Applicant's '820 Mark, including, but not limited to clearance and investigative searches for service marks, trademarks, trade names, or corporate names.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly

outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

11. All documents referring to or discussing any correspondence, telephone calls, oral discussions, meetings, messages, SMS or text messages, e-mails or other communications or contacts with any person or entity (other than your attorneys) concerning Red Bull, Red Bull's '045 Mark, Red Bull's '994 Mark, Red Bull's '283 Mark, Red Bull's '959 Mark, or Red Bull's RED BULL and Bull Logo Marks, or any similarity, conflict or confusion between Applicant's '816 Mark or Applicant's '020 Mark and Red Bull or Red Bull's '045 Mark, Red Bull's '994 Mark, Red Bull's '283 Mark, Red Bull's '959 Mark, or Red Bull's RED BULL and Bull Logo Marks.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or

confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

12. All documents concerning Your first knowledge pertaining to Red Bull.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

13. All documents concerning Your first knowledge pertaining to Red Bull's '045 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

14. All documents concerning Your first knowledge pertaining to Red Bull's '994 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy

under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

15. All documents concerning Your first knowledge pertaining to Red Bull's '283 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

16. All documents concerning Your first knowledge pertaining to Red Bull's '959 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

17. All documents concerning Your first knowledge pertaining to Red Bull's RED BULL and Bull Logo Marks.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or

confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

18. Documents sufficient to evidence or support each of Applicant's admissions contained in Applicant's Amended Answer to Opposer's Amended Notice Opposition for Opposition #91-210,282 (the "Parent Opposition").

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

19. Documents sufficient to evidence or support each of Applicant's denials contained in Applicant's Amended Answer to Opposer's Amended Notice of Opposition for the Parent Opposition.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

20. Documents sufficient to evidence or support each of Applicant's admissions contained in Applicant's Answer to Notice of Opposition for Opposition #91-214,537 (the "Child Opposition").

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible

evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

21. Documents sufficient to evidence or support each of Applicant's denials contained in Applicant's Answer to Notice of Opposition for the Child Opposition.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially

dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

22. Documents sufficient to identify all types of products and services currently or previously offered, marketed or sold under Applicant's '816 Mark, by You or on Your behalf.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

23. Documents sufficient to identify all types of products and services currently or previously offered, marketed or sold under Applicant's '820 Mark, by You or on Your behalf.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

24. Documents and things concerning or relating to all current, commercial use by You of Applicant's '816 Mark on any goods or services.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or

confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

25. Documents and things concerning or relating to all current, commercial use by You of Applicant's '820 Mark on any goods or services.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

26. Documents sufficient to identify all the types of products or services planned to be offered, marketed or sold under Applicant's '816 Mark, by You or on Your behalf.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

27. Documents sufficient to identify all the types of products or services planned to be offered, marketed or sold under Applicant's '820 Mark, by You or on Your behalf.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly

gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

28. Documents sufficient to evidence or support Applicant's bona fide intent to use Applicant's '816 Mark in U.S. commerce as a trademark on each and every item of goods and services set forth in U.S. Appin. No. 85/680,816.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially

dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

29. Documents sufficient to evidence or support Applicant's bona fide intent to use Applicant's '820 Mark in U.S. commerce as a trademark on each and every item of goods set forth in U.S. Appin. No. 85/969,820.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

30. Documents sufficient to evidence or support any and all specific steps or actions taken to make use of Applicant's '816 Mark in U.S. commerce as a trademark in connection with each and every item of goods and services set forth in U.S. Appin. No. 85/680,816.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

31. Documents sufficient to evidence or support any and all specific steps or actions taken to make use of Applicant's '820 Mark in U.S. commerce as a trademark in connection with each and every item of goods set forth in U.S. Appin. No. 85/969,820.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly

outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

32. Documents sufficient to evidence, refer or relate to any objection, cease and desist letter or complaint relating to the mark of Appin. Nos. 85/680,816, however used, both prior to filing or since filing Applicant's '816 Mark, by or on behalf of any person or entity, whether brought by or against Applicant or any affiliate.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially

dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

33. Documents sufficient to evidence, refer or relate to any objection, cease and desist letter or complaint relating to the mark of Appin. Nos. 85/969,820, however used, both prior to filing or since filing Applicant's '820 Mark, by or on behalf of any person or entity, whether brought by or against Applicant or any affiliate.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

34. All documents which refer or relate to any administrative proceedings or litigation, in the courts, the U.S. Patent and Trademark Office or elsewhere, involving the marks of Appin. Nos. 85/680,816 or 85/969,820, whether brought by or against Applicant or any affiliate.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

35. All documents relating or referring to any instance in which Applicant has been aware of, or made aware of, a person being confused, mistaken, or deceived as to the source of Applicant's products or services advertised, promoted offered for sale or sold under Applicant's '816 Mark, whether brought prior to filing or since filing Applicant's '816 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

36. All documents relating or referring to any instance in which Applicant has been aware of, or made aware of, a person being confused, mistaken, or deceived as to the source of Applicant's products or services advertised, promoted offered for sale or sold under Applicant's '820 Mark, whether brought prior to filing or since filing Applicant's '820 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly

outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

37. All documents relating or referring to any oral or written statements or inquiries by any person concerning any relationship or affiliation between Applicant and Red Bull.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

38. Documents sufficient to identify the channels of trade and distribution through which each and every product and services under Applicant's '816 Mark are/will be marketed and/or sold.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

39. Documents sufficient to identify the channels of trade and distribution through which each and every product under Applicant's '820 Mark are/will be marketed and/or sold.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible

evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

40. Documents sufficient to identify the target consumer group for the products, services, intended products, and intended services under Applicant's '816 Mark, including documents sufficient to identify ten (10) representative types of purchasers and/or potential purchasers of the products and/or services under Applicant's '816 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy

under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

41. Documents sufficient to identify the target consumer group for the products and intended products under Applicant's '820 Mark, including documents sufficient to identify ten (10) representative types of purchasers and/or potential purchasers of the products and/or services under Applicant's '820 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

42. Documents sufficient to show any and all negotiations and agreements relating to steps taken in preparation for the intended use of Applicant's '816 Mark in connection with each and every good and services of Appin. No. 85/680,816, including, but not limited to, documentation and negotiations and agreements relating to or involving contracts for goods or services, license agreements, proposals, bids or any other document or discussion relating to the intended use of Applicant's '816 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

43. Documents sufficient to show any and all negotiations and agreements relating to steps taken in preparation for the intended use of Applicant's '820 Mark in connection with each and every good and services of Appin. No. 85/969,820, including, but not limited to, documentation and

negotiations and agreements relating to or involving contracts for goods or services, license agreements, proposals, bids or any other document or discussion relating to the intended use of Applicant's '820 Mark.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

44. All documents and things which identify all persons or entities that have a direct or beneficial ownership interest in Stockmarket Burger, Inc. and all persons or entities in which Stockmarket Burger, Inc. has a direct or beneficial ownership interest.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks

information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

45. All documents and thinks which identify all past and current officers and directors of Stockmarket Burger, Inc.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is

currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

46. All documents and things which evidence, refer or relate to any and all changes in the corporate structure, ownership structure, financial structure and management of Stockmarket Burger, Inc. since its inception.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

47. All documents or things identified by Applicant in response to Opposer's First Set of Interrogatories to Applicant.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

48. All documents and things (excluding correspondence to/from your attorney), not otherwise provided in response to the above, which refer or relate to this opposition proceeding. If all documents have already been included in response to the above, please indicate the Request(s) in response to which such document(s) were provided.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly

gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

49. All documents Applicant intends to use or may use as evidence in this opposition proceeding.

Response:

Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

Dated as of: December 24, 2014

By: /Tianjiao Gu/  
Stockmarket Burger, Inc.  
13603 Marina Pointe Drive. C520  
Marina Del Rey, CA 90292  
(714)262-3549

**PROOF OF SERVICE**

I hereby certify that a true and complete copy of the foregoing **APPLICANT'S RESPONSES TO INTERROGATORIES** has been served on Martin R. Greenstein, counsel for Opposer, on December 24, 2014, via First Class U.S. Mail, postage prepaid to:

Martin R. Greenstein  
TechMark a Law Corporation  
4820 Harwood Road, 2nd Floor  
San Jose, CA 95124-5273

By: /Tianjiao Gu/  
Tianjiao Gu

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

BY: \_\_\_\_\_

RED BULL GMBH,	)	
	)	
Opposer,	)	Consolidated Opposition No.: 91210282
	)	Opposition No. 91210282
	)	Opposition No. 91214537
v.	)	
	)	Serial Nos. 85680816, 85969820
	)	Mark: STOCKMARKET, Bull and Swirl
STOCKMARKET BURGER, INC.,	)	Design
Applicant.	)	
	)	
	)	
	)	

**APPLICANT'S RESPONSES TO OPPOSER'S  
REQUEST FOR ADMISSIONS**

PROPOUNDING PARTY: RED BULL GMBH  
RESPONDING PARTY: STOCKMARKET BURGER, INC.  
SET NUMBER: ONE

Pursuant to Federal Rules of Civil Procedure, Applicant STOCKMARKET BURGER, INC. (hereinafter, "Applicant") hereby provides its Responses to Opposer, RED BULL GMBH's (hereinafter, "Opposer") Request for Production of Admissions. Set One, as follows:

**RESPONSES**

Applicant specifically objects to each and every request for admission, nos. 1 – 1193, on the following grounds:  
Applicant objects to this request on the grounds that it is overbroad, unduly burdensome, and does not specify with reasonable particularity the information or documents to be produced and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of

admissible evidence. In particular, the request is unduly burdensome because Opposer could not possibly gain any benefit from the information/documents and/or the benefit to be gained is vastly outweighed by the burden and expense of responding/production by Applicant. Applicant objects to this request to the extent it seeks information containing trade secret or other proprietary or confidential business information of Applicant, or that is subject to Applicant's right of privacy under California or federal law. Applicant objects to this request on the grounds that there is currently a motion for judgment on the pleadings pending in this case. The motions are potentially dispositive of the proceeding, and therefore Applicant need not respond to discovery, which may be moot upon the Board's decision on the motion.

Dated as of: January 7, 2015

By:     /Tianjiao Gu/      
Stockmarket Burger, Inc.  
13603 Marina Pointe Drive. C520  
Marina Del Rey, CA 90292  
(714)262-3549

**PROOF OF SERVICE**

I hereby certify that a true and complete copy of the foregoing **APPLICANT'S RESPONSES TO ADMISSIONS** has been served on Martin R. Greenstein, counsel for Opposer, on January 7, 2015, via First Class U.S. Mail, postage prepaid to:

Martin R. Greenstein  
TechMark a Law Corporation  
4820 Harwood Road, 2nd Floor  
San Jose, CA 95124-5273

By: /Tianjiao Gu/  
Tianjiao Gu

# Exhibit C

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**From:** Leah Halpert <LZH@TechMark.com>  
**Sent:** Monday, February 2, 2015 2:48 PM  
**To:** Paulo de Almeida  
**Cc:** Alex Patel; Martin R. Greenstein; Angel Riordan; Derek Palmer  
**Subject:** FW: Our ref: 6.013.223, 6.015.406 & 6.015.976 - Red Bull GmbH v Stockmarket Burger, Inc. - Consolidated Oppo 91-210,282 & Cancellation 92-059,220

Dear Paulo,

Please let me know if you are available for a meet & confer telephone conference to discuss your client's insufficient discovery responses on Thursday, February 5, 2015 at 1:30pm. If this date is not acceptable, please provide a more convenient date/time.

Regards,  
Leah

**Leah Z. Halpert** | Associate  
TechMark a Law Corporation  
Trademark & Intellectual Property Law  
4820 Harwood Road | 2<sup>nd</sup> Floor | San Jose, CA 95124-5273  
Tel: 408-266-4700; Fax: 408-850-1955  
E-Mail: [LZH@TechMark.com](mailto:LZH@TechMark.com)

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**From:** Leah Halpert [mailto:LZH@TechMark.com]  
**Sent:** Thursday, January 29, 2015 12:02 PM  
**To:** Paulo de Almeida  
**Cc:** Martin R. Greenstein; Angel Riordan; Derek Palmer  
**Subject:** Our ref: 6.013.223, 6.015.406 & 6.015.976 - Red Bull GmbH v Stockmarket Burger, Inc. - Consolidated Oppo 91-210,282 & Cancellation 92-059,220

Dear Paulo,

In light of the resumption of the subject proceedings, would you be available for a meet & confer to discuss your client's insufficient discovery responses on either Tuesday or Thursday of next week (February 3 or 5, 2015) after 1:30pm PST?

If those dates are not acceptable, please let us know when would be more convenient.

Regards,  
Leah

**Leah Z. Halpert** | Associate  
TechMark a Law Corporation  
Trademark & Intellectual Property Law  
4820 Harwood Road | 2<sup>nd</sup> Floor | San Jose, CA 95124-5273  
Tel: 408-266-4700; Fax: 408-850-1955  
E-Mail: [LZH@TechMark.com](mailto:LZH@TechMark.com)

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