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

Proceeding	91213286
Party	Plaintiff Starbuzz Tobacco, Inc.
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Attachments	EXH. B_Part1.pdf(4173446 bytes)

EXHIBIT B

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

In the matter of Trademark
Application Serial No. 85/846,992
Mark: MOCHA MIST
Filed: February 12, 2013
Published: July 9, 2013

STARBUZZ TOBACCO, INC.

Opposer,

v.

SIS RESOURCES LTD.

Applicant.

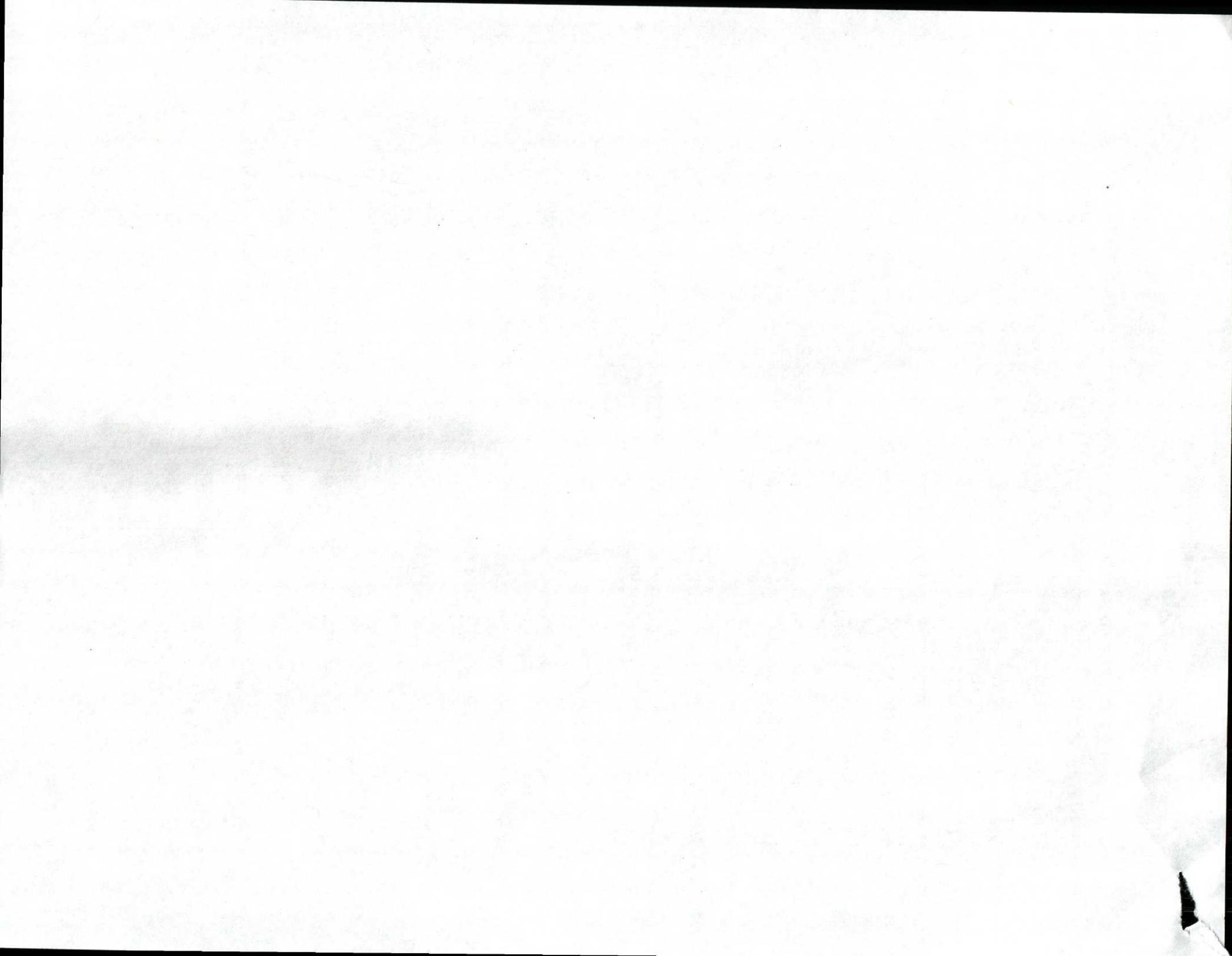
Opposition No. 91213286

**APPLICANT'S ANSWERS AND OBJECTIONS TO
OPPOSER'S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and 37 C.F.R. § 2.120, Applicant SIS Resources Ltd. (hereinafter "SIS Resources" or "Applicant"), by and through counsel, objects and answers to Opposer Starbuzz Tobacco, Inc. (hereinafter "Opposer") First Set of Interrogatories as follows:

GENERAL OBJECTIONS

A. SIS Resources responds to each Interrogatory subject to the general objections set forth herein. These limitations and objections form a part of the response to each Interrogatory. These limitations and objections may be specifically referred to in a response to certain Interrogatories for the purpose of clarity. However, the failure to incorporate specifically a general objection is not a waiver of such objection.



B. SIS Resources objects to the definition of "SIS" in Paragraph 2 on page 2 of Opposer's First Set of Interrogatories as the term is overly broad and unduly burdensome. For its answers and objections, SIS Resources takes the term "SIS" to mean SIS Resources, the named Applicant in the above-captioned proceeding.

C. SIS Resources objects to the terms "all," "any," "each," "describe," "identify," and "relating" as the terms are vague and ambiguous, overly broad and unduly burdensome, and incorporate multiple subparts into the Interrogatories.

D. SIS Resources objects to the Interrogatories, including but not limited to the definitions to Opposer's First Set of Interrogatories on pages 1-5, to the extent that they purport to impose obligations or actions beyond those required by the Rules of Practice in Trademark Cases (*i.e.*, 37 C.F.R. Part 2), the Trademark Trial and Appeal Board Manual of Procedure ("TBMP"), and the Federal Rules of Civil Procedure. SIS Resources responds to the Interrogatories only to the extent required thereby and subject to the above-stated objection.

E. SIS Resources objects to the Interrogatories to the extent that they seek production or disclosure of privileged information. SIS Resources will not produce or disclose documents or information considered to be the subject of attorney-client privilege, the work product doctrine, or any other applicable claim, law, or rule of privilege or immunity ("privileged information") in response to the Interrogatories, and SIS Resources' responses exclude all privileged information.

F. SIS Resources objects to the Interrogatories to the extent that they seek the production or disclosure of confidential information and documents, including trade secret privilege information ("confidential information").



G. SIS Resources objects to the Interrogatories to the extent that they request the production or disclosure of information that is neither relevant to the subject matter involved in the pending Opposition nor reasonably calculated to lead to the discovery of admissible evidence.

H. SIS Resources objects to the Interrogatories to the extent that they seek information or documents from an indefinite period of time.

I. SIS Resources objects to the Interrogatories to the extent that they are vague and ambiguous and overly broad and unduly burdensome.

J. SIS Resources objects to the Interrogatories to the extent that they contain two or more subparts and should therefore be considered two or more separate Interrogatories as stated under the Rules of Practice in Trademark Cases, the TBMP, and the Federal Rules of Civil Procedure.

K. In making these objections, SIS Resources does not waive or intend to waive (a) any objection as to competency, relevancy, materiality, or admissibility of any information that may be produced or disclosed in response to the Interrogatories; (b) any right to object on any ground to the use of any information that may be produced or disclosed in response to the Interrogatories, or the subject matter thereof, at any subsequent proceeding, including the hearing for this or any other action; and (c) all rights to object on any ground to any Interrogatory or any other discovery request.

L. SIS Resources' failure to object on a particular ground or grounds shall not be construed as a waiver of its rights to object on any additional ground.

M. SIS Resources reserves the right to amend or supplement its responses as additional information is learned during further investigation and discovery.

Subject to and without waiving the foregoing, SIS Resources responds to the Interrogatories as follows:

INTERROGATORIES

INTERROGATORY NO. 1:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Green Smoke, Inc.

RESPONSE TO INTERROGATORY NO. 1:

SIS Resources objects to Interrogatory No. 1 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 1 to the extent that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 1 to the extent that it seeks privileged and confidential information.

INTERROGATORY NO. 2:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Sammy Capuano.

RESPONSE TO INTERROGATORY NO. 2:

SIS Resources objects to Interrogatory No. 2 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 2 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal

opinions of counsel. SIS Resources further objects to Interrogatory No. 2 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 3:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Silicon Innovations, Inc.

RESPONSE TO INTERROGATORY NO. 3:

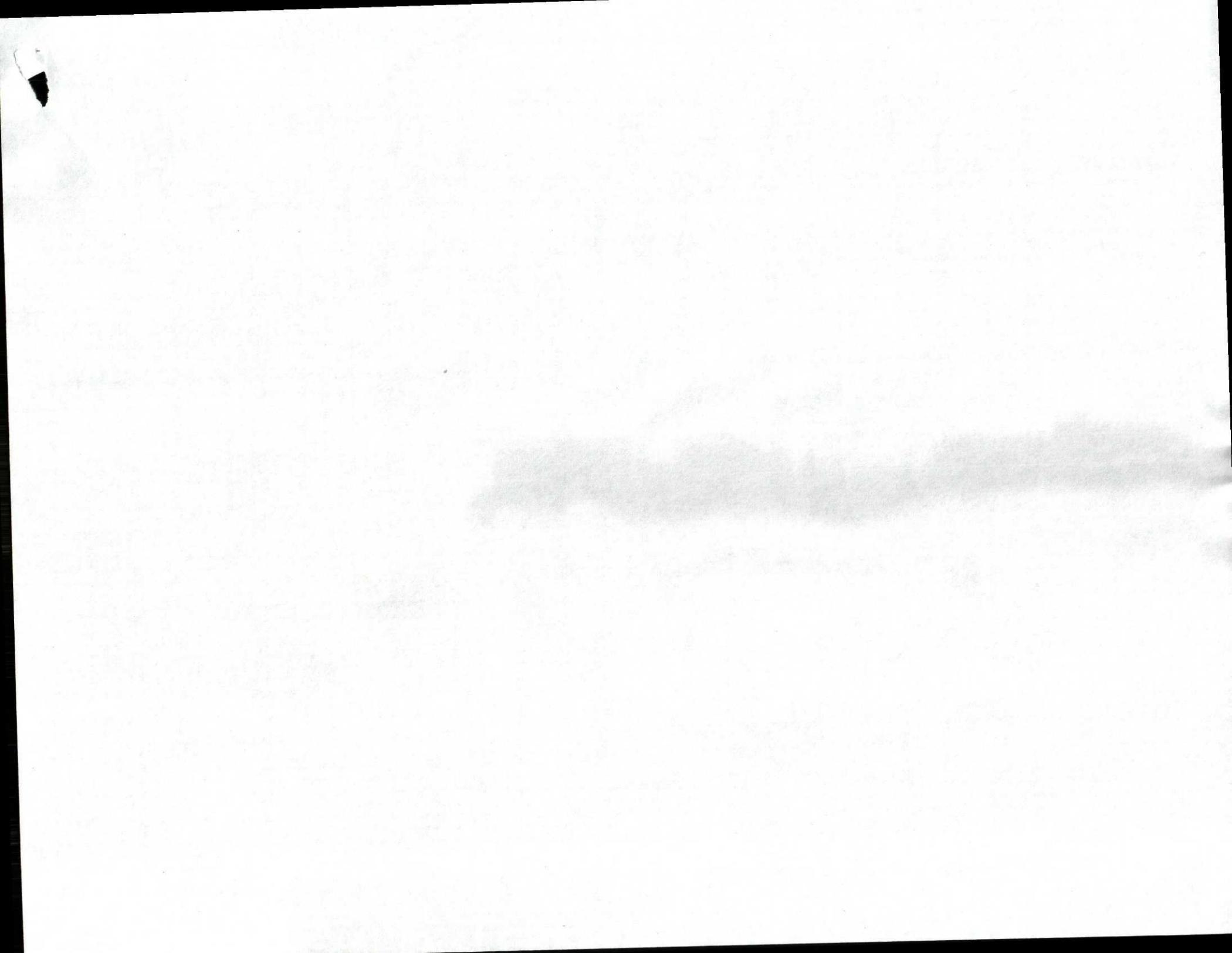
SIS Resources objects to Interrogatory No. 3 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 3 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 3 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 4:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Sorsa Holdings, Inc.

RESPONSE TO INTERROGATORY NO. 4:

SIS Resources objects to Interrogatory No. 4 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 4 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions



and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 4 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 5:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Ori E. Adivi.

RESPONSE TO INTERROGATORY NO. 5:

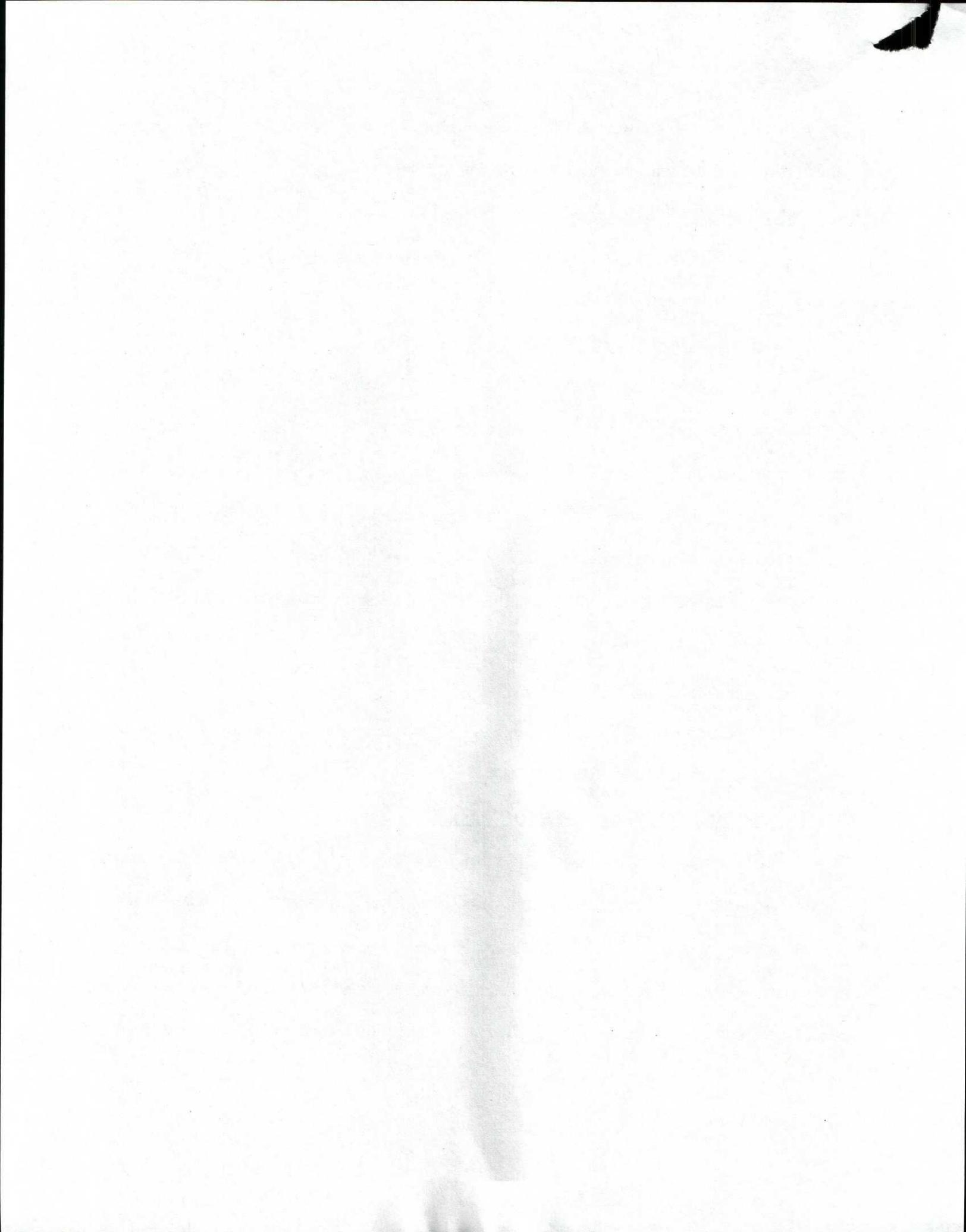
SIS Resources objects to Interrogatory No. 5 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 5 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 5 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 6:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Robert Levitz.

RESPONSE TO INTERROGATORY NO. 6:

SIS Resources objects to Interrogatory No. 6 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 6 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal



opinions of counsel. SIS Resources further objects to Interrogatory No. 6 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 7:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Gs Vapors, Inc.

RESPONSE TO INTERROGATORY NO. 7:

SIS Resources objects to Interrogatory No. 7 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 7 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 7 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 8:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Reuven Levitz.

RESPONSE TO INTERROGATORY NO. 8:

SIS Resources objects to Interrogatory No. 8 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 8 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal

opinions of counsel. SIS Resources further objects to Interrogatory No. 8 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 9:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with GS Sorsa, Inc.

RESPONSE TO INTERROGATORY NO. 9:

SIS Resources objects to Interrogatory No. 9 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 9 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 9 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 10:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Sorsa Holdings, Inc.

RESPONSE TO INTERROGATORY NO. 10:

SIS Resources objects to Interrogatory No. 10 on the grounds that it is duplicative of Interrogatory No. 4. SIS Resources also object to Interrogatory No. 10 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources further objects to Interrogatory No. 10 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to

mental impressions and legal opinions of counsel. Additionally, SIS Resources objects to Interrogatory No. 10 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 11:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Reuven Ravitz.

RESPONSE TO INTERROGATORY NO. 11:

SIS Resources objects to Interrogatory No. 11 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 11 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 11 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 12:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's relationship with Fine Wine and Flowers, Inc.

RESPONSE TO INTERROGATORY NO. 12:

SIS Resources objects to Interrogatory No. 12 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 12 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions



and legal opinions of counsel. SIS Resources further objects to Interrogatory No. on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 13:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify SIS's corporate structure including articles of incorporation, identities of corporate officers, shareholders and owners of all stock classes.

RESPONSE TO INTERROGATORY NO. 13:

SIS Resources objects to Interrogatory No. 13 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 13 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 13 to the extent that it seeks privileged and confidential information.

Subject to and without waiving the foregoing objections, SIS Resources will produce non-privileged, responsive documents, if any, pursuant to its Responses and Objections to Opposer's First Requests for Production of Documents at a time and place mutually convenient to the parties.

INTERROGATORY NO. 14:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify Green Smoke, Inc.'s corporate structure including articles of incorporation, identities of corporate officers, shareholders and owners of all stock classes.

RESPONSE TO INTERROGATORY NO. 14:

SIS Resources objects to Interrogatory No. 14 on the grounds that it is overly broad and unduly burdensome with its request to “[d]escribe in detail all Documents,” irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 14 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 14 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 15:

Describe in detail all Documents in SIS’s possession, custody or control sufficient to identify Sorsa Holdings, Inc.’s corporate structure including articles of incorporation, identities of corporate officers, shareholders and owners of all stock classes.

RESPONSE TO INTERROGATORY NO. 15:

SIS Resources objects to Interrogatory No. 15 on the grounds that it is overly broad and unduly burdensome with its request to “[d]escribe in detail all Documents,” irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 15 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 15 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 16:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify Gs Sorsa, Inc.'s corporate structure including articles of incorporation, identities of corporate officers, shareholders and owners of all stock classes.

RESPONSE TO INTERROGATORY NO. 16:

SIS Resources objects to Interrogatory No. 16 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 16 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 16 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 17:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify Gs Vapors, Inc.'s corporate structure including articles of incorporation, identities of corporate officers, shareholders and owners of all stock classes.

RESPONSE TO INTERROGATORY NO. 17:

SIS Resources objects to Interrogatory No. 17 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 17 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions

and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 17 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 18:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify Silicon Innovations, Inc.'s corporate structure including articles of incorporation, identities of corporate officers, shareholders and owners of all stock classes.

RESPONSE TO INTERROGATORY NO. 18:

SIS Resources objects to Interrogatory No. 18 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 18 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 18 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 19:

Describe in detail all Documents in SIS's possession, custody or control sufficient to identify Fine wine and flowers, Inc.'s corporate structure including articles of incorporation, identities of corporate officers, shareholders and owners of all stock classes.

RESPONSE TO INTERROGATORY NO. 19:

SIS Resources objects to Interrogatory No. 19 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 19 on the grounds that it seeks information protected

by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 19 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 20:

Describe in detail all Documents in SIS's possession, custody or control sufficient to show the first date of use of the mark MOCHA MIST in commerce anywhere in the world.

RESPONSE TO INTERROGATORY NO. 20:

SIS Resources objects to Interrogatory No. 20 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," not reasonably restricted in geographic scope, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 20 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 20 on the grounds that it seeks privileged and confidential information.

Subject to and without waiving the foregoing objections, SIS Resources will produce non-privileged, responsive documents, if any, pursuant to its Responses and Objections to Opposer's First Requests for Production of Documents at a time and place mutually convenient to the parties.

INTERROGATORY NO. 21:

Describe in detail all Documents in SIS's possession, custody or control that describe how SIS adopted each mark, including the identity of all alternative marks considered by SIS before selecting the MOCHA MIST Mark and the reason such alternative marks were rejected.

RESPONSE TO INTERROGATORY NO. 21:

SIS Resources objects to Interrogatory No. 21 on the grounds that it is vague and ambiguous with its reference to "how SIS adopted each mark." SIS Resources also objects to Interrogatory No. 21 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources further objects to Interrogatory No. 21 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. Additionally, SIS Resources objects to Interrogatory No. 21 on the grounds that it seeks privileged and confidential information.

Subject to and without waiving the foregoing objections, SIS Resources will produce non-privileged, responsive documents, if any, pursuant to its Responses and Objections to Opposer's First Requests for Production of Documents at a time and place mutually convenient to the parties.

INTERROGATORY NO. 22:

Describe in detail all Documents in SIS's possession, custody or control that identify any and all domain names registered by or associated with SIS that incorporate or include the MOCHA MIST Mark.

RESPONSE TO INTERROGATORY NO. 22:

SIS Resources objects to Interrogatory No. 22 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 22 on the grounds that it is vague and ambiguous

with its reference to "associated with SIS." SIS Resources further objects to Interrogatory No. 22 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. Additionally, SIS Resources objects to Interrogatory No. 22 on the grounds that it seeks privileged and confidential information.

Subject to and without waiving the foregoing objections, SIS Resources states that it is unaware of responsive documents.

INTERROGATORY NO. 23:

Describe in detail all Documents in SIS's possession, custody or control that identify by address each location in which SIS is in fact doing business.

RESPONSE TO INTERROGATORY NO. 23:

SIS Resources objects to Interrogatory No. 23 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 23 on the grounds that it is vague and ambiguous with its reference to "in fact doing business." SIS Resources further objects to Interrogatory No. 23 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel.

Subject to and without waiving the foregoing objections, SIS Resources will produce non-privileged, responsive documents, if any, pursuant to its Responses and Objections to Opposer's First Requests for Production of Documents at a time and place mutually convenient to the parties.

INTERROGATORY NO. 24:

Describe in detail all Documents in SIS's possession, custody or control that identify by address each location in which SIS has done business in the past.

RESPONSE TO INTERROGATORY NO. 24:

SIS Resources objects to Interrogatory No. 24 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, not reasonably restricted in time, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also object to Interrogatory No. 24 on the grounds that it is vague and ambiguous with its references to "has done business" and "past." SIS Resources further objects to Interrogatory No. 24 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel.

INTERROGATORY NO. 25:

Describe in detail all Documents in SIS's possession, custody or control that identify any and all locations, including geographic areas or territories, in which SIS intends to market any product any product [sic]/service under the MOCHA MIST Mark in the future.

RESPONSE TO INTERROGATORY NO. 25:

SIS Resources objects to Interrogatory No. 25 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," irrelevant, and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 25 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions

and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 25 on the grounds that it seeks privileged and confidential information.

INTERROGATORY NO. 26:

Describe in detail all Documents in SIS's possession, custody or control that identify any periods of discontinuance of use of the mark MOCHA MIST.

RESPONSE TO INTERROGATORY NO. 26:

SIS Resources objects to Interrogatory No. 26 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also objects to Interrogatory No. 26 on the grounds that it seeks information protected by the attorney-client/work product privileges, including but not limited to mental impressions and legal opinions of counsel. SIS Resources further objects to Interrogatory No. 26 on the grounds that it seeks privileged and confidential information.

Subject to and without waiving the foregoing objections, SIS Resources states that it is unaware of responsive documents.

INTERROGATORY NO. 27:

Describe in detail all Documents in SIS's possession, custody or control that specify the manner and goods/services in which the MOCHA MIST Mark has been used or is used being used.

RESPONSE TO INTERROGATORY NO. 27:

SIS Resources objects to Interrogatory No. 27 on the grounds that it is overly broad and unduly burdensome with its request to "[d]escribe in detail all Documents," and therefore not reasonably calculated to lead to the discovery of admissible evidence. SIS Resources also