

ESTTA Tracking number: **ESTTA637945**

Filing date: **11/10/2014**

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

Proceeding	91214795
Party	Plaintiff Instagram, LLC
Correspondence Address	BOBBY GHAJAR PILLSBURY WINTHROP SHAW PITTMAN LLP 725 S FIGUEROA ST, STE 2800 LOS ANGELES, CA 90017 UNITED STATES Bobby.Ghajar@pillsburylaw.com, Marcus.Peterson@pillsburylaw.com, Docket_IP@pillsburylaw.com
Submission	Motion to Extend
Filer's Name	Marcus Peterson
Filer's e-mail	bobby.ghajar@pillsburylaw.com, marcus.peterson@pillsburylaw.com, docket_ip@pillsburylaw.com
Signature	/Marcus Peterson/
Date	11/10/2014
Attachments	Motion to Extend (discovery and expert disclosure deadline).pdf(972312 bytes)

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

Instagram, LLC,	§	Opposition No. 91214795
	§	
Opposer,	§	Serial No.: 85/742,628
	§	
v.	§	Mark: INSTAPRINTS
	§	
Sean Broihier and Associates, LLC,	§	International Classes: 16, 35, 40
	§	
Applicant.	§	Published: October 8, 2013
	§	

**OPPOSER INSTAGRAM, LLC’S MOTION TO EXTEND DISCOVERY DEADLINE
AND OTHER TRIAL DATES**

Pursuant to Rule §2.120(a)(2) of the Trademark Rules of Practice and §510.03(a) of the Trademark Trial and Appeal Board Manual of Procedure (“TBMP”), Opposer Instagram, LLC (“Opposer” or “Instagram”) hereby moves the Board for an order to extend the discovery period and all related dates, including the expert disclosure deadline, in the above-referenced proceeding by a period of at least sixty (60) days.

On October 12, 2014, Opposer filed with the Board a Motion to Strike, or a Motion for Judgment on the Pleadings, as to Applicant Sean Broihier and Associates, LLC’s (“Applicant”) affirmative defenses on the grounds that they are improperly pleaded and legally insufficient. Within that Motion, Opposer requested that the Board suspend the proceedings pending disposition of the Motion, given that the outcome of the Motion will impact discovery. That request made was in accordance with TBMP 510.03(a) and 37 C.F.R. §2.127(d) (“When any party files a motion to dismiss, or a motion for judgment on the pleadings [], the case will be suspended by the Trademark Trial and Appeal Board with respect to all matters not germane to the motion...”).

On November 7, 2014 the Board suspended the proceedings pending the disposition of the motion, but in that Order, stated that, “This suspension order does not toll the time for either party to respond to any outstanding discovery or to serve expert or pretrial disclosures.” Dkt.

15. However, the deadline to serve expert disclosures is generally extended when the discovery cutoff is extended. *See* TBMP §403.04 (“when the parties stipulate to an extension of the closing date for discovery, or a motion for such an extension is granted, **or the Board orders such an extension**, the Board ordinarily will, as a matter of course, reset the deadline for expert disclosure.”) (emphasis added). The expert disclosure deadline is currently set for November 12, 2014 and the discovery deadline is set for December 12, 2014. When the Board rules on the Motion to Strike, it will reset the discovery deadline, and Opposer requests that it reset the expert disclosure deadline at that time, as well.

Accordingly, to avoid any situation in which Opposer is left with insufficient time to complete discovery, assess the need for expert disclosures, and make its expert disclosures, Opposer seeks a 60-day extension of all dates, including the expert disclosure deadline, upon the Board’s resumption of the proceedings following its Order on the Motion to Compel.

Alternatively, if the Board is inclined to set a new schedule now, Opposer requests a sixty (60) day extension of all current dates, as follows:

Event	Deadline
Expert Disclosures Due:	January 11, 2015
Discovery Closes:	February 10, 2015
Plaintiff’s Pretrial Disclosures:	March 25, 2015
Plaintiff’s 30-day Trial Period Ends:	May 11, 2015
Defendant’s Pretrial Disclosures:	May 26, 2015
Defendant’s 30-day Trial Period Ends:	July 10, 2015

Plaintiff's Rebuttal Disclosures:	May 25, 2015
Plaintiff's 15-day Rebuttal Period Ends:	August 24, 2015

This request is not made for the purposes of delay. Good cause exists for such an extension, as the parties cannot complete discovery without knowing which, if any, of Applicant's affirmative defenses are still at issue. Separately, Opposer is missing key documents and information from Applicant that Opposer has sought in discovery, and it has refrained from filing a motion to compel because it is waiting for Applicant's counsel to make itself available to meet and confer. Declaration of Marcus D. Peterson ("Peterson Decl."), ¶¶2-3; Ex. A (attaching October 21 meet and confer letter). The instant extension will allow the Board to rule on the pending motion; give the parties sufficient time to conduct discovery and resolve the discovery dispute; and provide Opposer (and Applicant, if it so chooses) with enough time to consider and make expert disclosures. Moreover, given that the expert disclosure deadline generally flows from the discovery cutoff, and given that the parties should not be required to complete their expert disclosures while the rest of the case remains suspended pending the motion to strike, there is good cause for moving the expert disclosure deadline, as well.

This request will not prejudice Applicant. The Board has already suspended the proceeding, and the discovery deadlines will be moved in due course. Thus, Applicant cannot argue that Opposer's request to move the expert disclosure deadline will create any additional delay. Independently, in response to Opposer's Motion to Strike, Applicant argued against the exclusion of its affirmative defenses on the grounds that it intends to take discovery as to them; therefore, to the extent any of Applicant's affirmative defenses are not stricken, Applicant would allow benefit from the extension.

Even before the Board issued the November 7th suspension order, Opposer attempted to secure Applicant's consent to extend the expert and discovery deadlines. However, in spite of Opposer's efforts, Applicant's counsel did not provide clear response indicating whether Applicant would oppose this motion, or the basis of such opposition. *Id.* at ¶4; Ex. B.

For all of the foregoing reasons, Opposer requests that the Board include expert discovery within its suspension order, or otherwise extend all current dates by sixty days as set forth above.

Date: November 10, 2014

By: /s/ Bobby Ghajar
Bobby Ghajar
Marcus Peterson
PILLSBURY WINTHROP SHAW PITTMAN
725 S. Figueroa St., Suite 2800
Los Angeles, CA 90017
(213) 488-7551

CERTIFICATE OF ELECTRONIC TRANSMISSION
DATE OF DEPOSIT November 10, 2014
I hereby certify that this correspondence is being transmitted to the United States Patent and Trademark Office Trademark Trial and Appeal Board using the Electronic System for Trademark Trials and Appeals (ESTTA) on the date indicated above.
<u>/s/ Marcus Peterson</u> Marcus Peterson

CERTIFICATE OF SERVICE VIA FIRST CLASS MAIL

I, Marcus Peterson, hereby certify that a true and complete copy of the foregoing OPPOSER INSTAGRAM, LLC'S MOTION TO EXTEND DISCOVERY DEADLINE AND OTHER TRIAL DATES was served on Applicant's counsel, Amy Sullivan Cahill, Stites & Harbison PLLC, 400 W. Market St., Suite 1800, Louisville, KY 40202-3352, via postage prepaid first-class mail on November 10, 2014.

/s/ Marcus Peterson
Marcus Peterson

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

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	§	
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	§	
Applicant.	§	Published: October 8, 2013
	§	

**DECLARATION OF MARCUS PETERSON IN SUPPORT OF OPPOSER
INSTAGRAM, LLC’S MOTION TO EXTEND DISCOVERY DEADLINE AND OTHER
TRIAL DATES**

I, Marcus Peterson, declare as follows:

1. I am an attorney at law and am an associate of the law firm Pillsbury Winthrop Shaw Pittman LLP, attorneys of record for Opposer, Instagram, LLC (“Opposer”). The matters stated in this declaration are based upon my own personal knowledge, except where otherwise indicated, and if called as a witness, I could and would testify competently thereto.

2. On October 21, 2014, my co-counsel Bobby Ghajar sent a meet and confer letter to counsel for Applicant regarding deficiencies in Applicant’s responses to Opposer’s Requests for Admission and Requests for Production of Documents. Attached as Exhibit A is a true and correct copy of the letter.

3. On November 2, 2014, Mr. Ghajar sent a follow-up email to counsel for Applicant, which he forwarded to me, as we had not received any response to the October 21 letter. Mr. Ghajar sent another follow-up email on November 6, on which I was copied. Counsel for Applicant responded that day, stating that she was in a conference and would be available to discuss the letter the following week.

4. In addition, in Mr. Ghajar's November 6 email, he noted that the Board had not yet suspended the proceedings after Opposer filed its Motion to Strike or for Judgment on the Pleadings and asked whether Applicant would agree to extend the discovery deadlines if the Board does not suspend the proceedings. Counsel for Applicant responded, stating her belief that a matter is only automatically suspended if there is a dispositive motion or a motion to compel. Mr. Ghajar responded in an email on which I was copied, stating that he believed the Board would suspend the proceedings, but in any event requesting Applicant's consent to file a stipulated motion to extend the discovery deadline by 60 days. Counsel for Applicant responded on November 7, stating, "I do not consent to a suspension of the proceeding." Mr. Ghajar responded, clarifying that Opposer is requesting a stipulation to extend the discovery cutoff while the Board rules on the pending motion. Counsel for Applicant did not respond to the email. Attached as Exhibit B is a true and correct copy of the email chain between counsel for the parties. I called counsel for Applicant on November 7 and left her a message asking for her response to the email, but she did not return the call.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

Executed this 10th day of November, 2014, in Los Angeles, California

A handwritten signature in black ink, appearing to read "Marcus Peterson", is written over a horizontal line.

Marcus Peterson

CERTIFICATE OF ELECTRONIC TRANSMISSION

DATE OF DEPOSIT November 10, 2014

I hereby certify that this correspondence is being transmitted to the United States Patent and Trademark Office Trademark Trial and Appeal Board using the Electronic System for Trademark Trials and Appeals (ESTTA) on the date indicated above.

/s/ Marcus Peterson

Marcus Peterson

CERTIFICATE OF SERVICE VIA FIRST CLASS MAIL

I, Marcus Peterson, hereby certify that a true and complete copy of the foregoing DECLARATION OF MARCUS PETERSON IN SUPPORT OF OPPOSER INSTAGRAM, LLC'S MOTION TO EXTEND DISCOVERY DEADLINE AND OTHER TRIAL DATES was served on Applicant's counsel, Amy Sullivan Cahill, Stites & Harbison PLLC, 400 W. Market St., Suite 1800, Louisville, KY 40202-3352, via postage prepaid first-class mail on November 10, 2014.

/s/ Marcus Peterson

Marcus Peterson

EXHIBIT A



Pillsbury Winthrop Shaw Pittman LLP

725 South Figueroa Street, Suite 2800 | Los Angeles, CA 90017-5406 | tel 213.488.7100 | fax 213.629.1033

Bobby A. Ghajar
tel 213.488.7551
bobby.ghajar@pillsburylaw.com

October 21, 2014

Via email acahill@stites.com

Amy S. Cahill, Esq.
Stites & Harbison PLLC
P400 W. Market Street, Suite 1800
Louisville, Kentucky 40202

**Re: *Instagram, LLC v. Sean Broihier & Associates, LLC*
Meet and Confer Request Relating to Discovery**

Dear Ms. Cahill:

Following our October 2, 2014 email and your reply, this is a further attempt to meet and confer regarding Applicant's responses to Instagram's Requests for Admission and Requests for Production of Documents, as well as Applicant's document production to date. Please review this letter, and let us know when next week you are available to meet and confer.

Your earlier letter did not address Applicant's use of boilerplate objections to numerous Requests for Production of Documents. Also, in spite of your assurance that Applicant would supplement its document production, that has not occurred. Instead, earlier this week, we received three (3) pages of "confidential" documents (one document was produced twice), consisting of a Google Analytics printout for the narrow timeframe of January 1 to October 8, 2014, and an unsigned vendor agreement. Those documents were marked CONFFAA088-91. We did not receive documents CONFFAA001-87. Please advise if you intended to send us additional documents or if the Bates numbers are erroneous.

As noted in our October 1st letter, Applicant's production is incomplete. We summarize various categories of documents that we have not received, and which we believe are in your client's possession, custody, or control.

Development of the INSTAPRINTS Mark (*see Document Request No. 6*)

Applicant has failed to provide any documentation referring to or evidencing the development of the INSTAPRINTS mark. We suspect there are documents, including correspondence that discuss the selection of the name and logo design, as well as design mock-ups of the INSTAPRINTS mark, and request that they be produced.

Use and Expansion of the INSTAPRINTS Mark and Associated Goods and Services (*see Document Request Nos. 4, 7-10, 15, 29*)

Contrary to Applicant's response to Instagram's Request for Production No. 4, Applicant has not produced any documentation pertaining to its first use of the INSTAPRINTS mark, including, for example, correspondence to or from its webhost once the instaprints.com website went public for the first time. We suspect that such documentation exists, and request that it be produced.

Applicant has not provided any documents showing its use of the INSTAPRINTS mark for current and intended goods and services. Based on Applicant's Supplemental Answers to the First Set of Interrogatories, served on October 11, we suspect that such documents must exist. For example, in Applicant's Suppl. Response to Interrogatory No. 19, Applicant states that "it has plans to expand the types of goods offered by Applicant in connection with the INSTAPRINTS mark to include clothing and bedding products." If this is correct, Applicant is likely to possess documentation, such as internal memoranda and emails, business proposals, and correspondence with manufacturers reflecting Applicant's plans to expand into at least those aforementioned areas of goods.

Applicant has also provided insufficient documents concerning the use or planned use of the INSTAPRINTS mark by third parties within the U.S. Although Applicant provided an unsigned copy of a Tongal "Deal Memo" (CONFFAA088) in its October 11th document production, we suspect there are more documents and correspondence with Tongal (including a signed agreement), and potentially other third party correspondence relating to the INSTAPRINTS mark and Applicant's actual and intended goods and services. We request production of all documentation related to third party agreements involving the INSTAPRINTS mark.

Advertising and Marketing (*See Document Request Nos. 16-21, 23, 25, 27*)

Applicant's document production in response to requests for its advertising activities and visitor data is wholly deficient. On October 11th, Applicant produced two relevant documents: a screen capture of its instaprints.com site Google Analytics

page, which only shows the *Audience Overview* statistics for January 1 – October 8, 2014 (CONFFAA091-92), and a copy of the aforementioned Tongal Deal Memo (CONFFAA088), which appears to outline a 2013 TV Commercial contest.

Applicant, however, stated in its Suppl. Response to Interrogatory No. 20 that “goods and services offered by Applicant in connection with the INSTAPRINTS mark have been marketed, advertised and promoted on the Internet including through online advertising in the following online advertising venues: on television, and through the web site www.youtube.com, www.facebook.com, www.google.com.”

All three websites listed by Applicant provide tools that allow business owners to access demographic information about their site visitors, including trends about age and gender, lifestyle and interest information, and location data. As evidenced by the Google Analytics supplemental documents (CONFFAA091-92) provided by Applicant, Applicant clearly has access to the audience and marketing tools offered by these sites. Therefore, Applicant is in possession of the documents requested showing the target market of the goods and services offered for sale in connection with the INSTAPRINTS mark. We also require production of this data for the entire time frame that the instaprints.com website (not just the narrow timeframe shown in the documents CONFFAA091-92) and its other pages on youtube.com, facebook.com, have been in existence.

Specifically, instead of a single screen shot of the “Audience Overview” Google Analytics page for January 1 to October 8, 2014, as shown on the CONFFAA091 document, we request production of documentation showing the “Audience Overview” for the entire period of the instaprints.com site’s existence, including all the information contained in every single sub-tab (e.g. “Demographics, Interests, Geo, Behavior, Technology, Mobile, Custom, Benchmarking”).

In addition, Facebook and Youtube provide specific targeting options, such as location, demographics, interests and behavior specifications, to allow business owners to define the relevant audience for advertisements on these sites. Please produce documentation reflecting Applicant’s selection of such options on these websites, as well as any other websites Applicant used to advertise the INSTAPRINTS mark.

Applicant also holds an active account on Twitter, as seen on its instaprints.com site. Like the sites discussed above, twitter.com provides business owners with audience analytics for its advertisements. Please produce all documents pertaining to Applicant’s advertising and marketing efforts on Twitter.

Finally, as Applicant has clearly expressed past advertising in other venues, including partnering with Tongal (as evidenced by “Deal Memo” CONFFAA088), we request documentation of these and planned advertising agreements in all venues, as well as any associated audience data. This includes all documents pertaining to marketing plans and research, forecasts, projections, media promotions, and current and planned partnerships with third parties in connection the INSTAPRINTS mark.

Financial Records (See Document Request Nos. 5, 25-26)

Applicant has failed to provide any documentation relating to its financial revenue or expenses associated with the goods and services under the INSTAPRINTS mark.

We suspect that Applicant keeps records of the pricing of its goods and services (wholesale and retail), its customers and registered site users, and the revenue generated by its site users who hold premium membership accounts. We also suspect that Applicant has financial records reflecting the expenses paid to third parties as part of Applicant’s advertising and marketing efforts in connection with the INSTAPRINTS mark. For example, the Tongal Deal Memo (CONFFAA088) references a project fee payable to Tongal by Sponsor (in this case, Applicant). We also suspect that Applicant has paid Google and potentially other search engine sites to promote the instaprints.com site in keyword search results. Consequently, we require all financial records, including receipts, invoices, correspondence concerning price negotiations for advertising, reflecting Applicant’s revenue and expenditures in connection with the INSTAPRINTS mark and Applicant’s goods and services.

Identities of Individuals Involved with Marketing (See Document Request #24)

Applicant has failed to provide any documentation identifying individuals involved with marketing efforts to promote the INSTAPRINTS mark. We suspect that there are at least records, such as emails, reflecting the identities of the Tongal representatives involved with the TV Commercial Project (Deal Memo, CONFFAA088). We request that you produce all documents reflecting the identities of those who have worked with Applicant in its efforts to promote the INSTAPRINTS mark.

Deficiencies in Applicant's Responses to First Set of Requests for Admission

Pursuant to our agreement this morning, Applicant may withdraw its motion to extend the time to respond to Instagram's First Set of Requests for Admission provided that Applicant agree, if necessary, to provide Instagram with a future extension of time relating to any discovery deadline (whether a response deadline or the discovery deadline).

We have now reviewed Applicant's responses to the Requests for Admission, and raise the following concerns. We reserve the right to raise additional issues with Applicant's responses.

Request 31 – Applicant refused to answer whether it was the first to register the instaprints.com domain name on grounds of “irrelevance.” This objection is not well taken. Instagram is entitled to an answer relating to the chain of title for the domain name on or through which your client hosts its website offering the INSTAPRINTS products and services.

Request 32 – Similarly, this request relates to Applicant's ownership of the domain name prior to a date certain. The request is relevant to establish when the domain name for the instaprints.com website was owned by your client.

We request that Applicant answer these requests.

In light of these issues, please let us know when and whether Applicant will produce the aforementioned, additional documents. Please also advise as to your availability for a phone call next week to discuss these issues.

We look forward to your response.

Sincerely,



Bobby Ghajar

EXHIBIT B

Peterson, Marcus D.

Subject: Instagram, LLC v. Sean Broihier & Associates, LLC - Meet and Confer Request Relating to Discovery

From: Ghajar, Bobby
Sent: Friday, November 07, 2014 8:58 AM
To: Cahill, Amy
Subject: Re: Instagram, LLC v. Sean Broihier & Associates, LLC - Meet and Confer Request Relating to Discovery

Amy,

That wasn't my question. My inquiry was whether you would agree to move the expert and discovery cut-offs back as the Board rules on the pending motion. Separately, even if you were not inclined to do so, we had an agreement that you stipulated to an extension of the discovery period in exchange for our agreement to consent to your client's late RFA responses. Let me know today how you want to handle.

Also, let's talk Monday about the October 21 letter we sent you.

Bobby

From: Cahill, Amy
Sent: Friday, November 7, 2014 7:08 AM
To: Ghajar, Bobby
Subject: Re: Instagram, LLC v. Sean Broihier & Associates, LLC - Meet and Confer Request Relating to Discovery

Bobby

I do not consent to a suspension of the proceeding.

Amy Cahilll

Sent from my iPhone

On Nov 6, 2014, at 4:16 PM, "Ghajar, Bobby"
<bobby.ghajar@pillsburylaw.com<<mailto:bobby.ghajar@pillsburylaw.com>>> wrote:

Hi Amy,

In my experience, the Board will suspend the proceeding on a motion to strike. Moreover, here, we've asked for relief under 12(c) as well, which is unquestionably a form of a dispositive motion. I believe it was simply an oversight by the Board.

In any event, the point of my raising it was to ensure that, in the absence of a suspension and new scheduling Order from the Board, we request that the dates be moved, e.g. by 60 days, and that we do so before the current deadlines run. In view of your email below and the issues raised in my October letter, we also need time for your client to supplement its production, and I'd rather do that than be forced to file a motion to compel given

the cut-offs. If you will stipulate to the extension of the expert and discovery cut-offs, I'll prepare the paperwork. If you will not, let me know today.

Bobby

Bobby Ghajar | Partner
Pillsbury Winthrop Shaw Pittman LLP
725 South Figueroa Street, Suite 2800 | Los Angeles, CA 90017-5406
t 213.488.7551<tel:213.488.7551> | c 818.633.0014<tel:818.633.0014>
bobby.ghajar@pillsburylaw.com<mailto:bobby.ghajar@pillsburylaw.com> | website
bio<<http://www.pillsburylaw.com/bobby.ghajar/bobby.ghajar>>
<image001.png>
<image002.png><<http://www.pillsburylaw.com/>>

From: Cahill, Amy [<mailto:acahill@stites.com>]
Sent: Thursday, November 06, 2014 2:07 PM
To: Ghajar, Bobby
Cc: Peterson, Marcus D.; De La Rosa, Inga L.
Subject: RE: Instagram, LLC v. Sean Broihier & Associates, LLC - Meet and Confer Request Relating to Discovery

Bobby:

I believe that the TBMP calls for automatic suspension only in the case of a potentially dispositive motion or motion to compel.

I am happy to discuss my client's discovery responses at your convenience next week. I am attending a conference out of town for the rest of this week.

Thank you,

Amy Cahill

From: Ghajar, Bobby [<mailto:bobby.ghajar@pillsburylaw.com>]
Sent: Thursday, November 06, 2014 2:35 PM
To: Cahill, Amy
Cc: Peterson, Marcus D.; De La Rosa, Inga L.
Subject: RE: Instagram, LLC v. Sean Broihier & Associates, LLC - Meet and Confer Request Relating to Discovery

Ms. Stites,

We are awaiting your response to our October 21 letter relating to your client's discovery responses and document production.

In the meantime, the Board has not yet issued an order suspending the proceeding pending resolution of Opposer's motion to strike. According to the TBMP, the matter should have been suspended upon the filing of Opposer's motion. We have expert and discovery cut-offs on 11/12/2014 and 12/12/2014 that should be moved (as per the suspension and upon resumption) but we wish to confirm that you agree that the expert disclosures and discovery cut-off dates will be extended. Unless we have your express agreement that these dates will be extended if the Board doesn't automatically do so, we intend to formally file a motion to extend the dates in

view of the pending motion.

Could I receive your response on this issue by tomorrow?

Bobby Ghajar | Partner
Pillsbury Winthrop Shaw Pittman LLP
725 South Figueroa Street, Suite 2800 | Los Angeles, CA 90017-5406
t 213.488.7551<<tel:213.488.7551>> | c 818.633.0014<<tel:818.633.0014>>
bobby.ghajar@pillsburylaw.com<<mailto:bobby.ghajar@pillsburylaw.com>> | website
bio<<http://www.pillsburylaw.com/bobby.ghajar/bobby.ghajar>>
<image001.png>
<image002.png><<http://www.pillsburylaw.com/>>

From: Ghajar, Bobby
Sent: Sunday, November 02, 2014 10:39 PM
To: De La Rosa, Inga L.; acahill@stites.com<<mailto:acahill@stites.com>>
Subject: RE: Instagram, LLC v. Sean Broihier & Associates, LLC - Meet and Confer Request Relating to Discovery

Ms. Stites,

We have not received any response to this letter. Please advise regarding your availability to meet and confer no later than this Wednesday, November 5.

Bobby

Bobby Ghajar | Partner
Pillsbury Winthrop Shaw Pittman LLP
725 South Figueroa Street, Suite 2800 | Los Angeles, CA 90017-5406
t 213.488.7551<<tel:213.488.7551>> | c 818.633.0014<<tel:818.633.0014>>
bobby.ghajar@pillsburylaw.com<<mailto:bobby.ghajar@pillsburylaw.com>> | website
bio<<http://www.pillsburylaw.com/bobby.ghajar/bobby.ghajar>>
<image001.png>
<image002.png><<http://www.pillsburylaw.com/>>

From: De La Rosa, Inga L.
Sent: Tuesday, October 21, 2014 3:58 PM
To: acahill@stites.com<<mailto:acahill@stites.com>>
Cc: Ghajar, Bobby; De La Rosa, Inga L.
Subject: Instagram, LLC v. Sean Broihier & Associates, LLC - Meet and Confer Request Relating to Discovery

Counsel:

On behalf of Bobby Ghajar, attached please find correspondence dated October 21, 2014.

Thank you.

Inga L. De La Rosa | Pillsbury Winthrop Shaw Pittman LLP
Legal Secretary
725 South Figueroa Street, Suite 2800 | Los Angeles, CA 90017-5406
t 213.488.7174<<tel:213.488.7174>> | f 213.629.1033<<tel:213.629.1033>> | c 714.403.2301<<tel:714.403.2301>>

inga.delarosa@pillsburylaw.com<mailto:inga.delarosa@pillsburylaw.com> |
[pillsburylaw.com](http://www.pillsburylaw.com)<<http://www.pillsburylaw.com>>
<image001.png>
<image002.png><<http://www.pillsburylaw.com/>>

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