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

Proceeding	91215896
Party	Defendant Innovation Brewing
Correspondence Address	IAN D GATES DASCENZO IP LAW PC 1000 SW BROADWAY STE 1555 PORTLAND, OR 97205 UNITED STATES ian@dascenzoiplaw.com,nita@dascenzoiplaw.com
Submission	Defendant's Notice of Reliance
Filer's Name	Ian D. Gates
Filer's e-mail	ian@dascenzoiplaw.com,nita@dascenzoiplaw.com
Signature	/Ian D. Gates/
Date	10/21/2016
Attachments	Applicants Notice of Reliance 10-21-2016.pdf(245128 bytes) Exhibits 1-4.pdf(5209078 bytes) Exhibit 5.pdf(4579334 bytes) Exhibits 6-20 - redacted.pdf(2571404 bytes) Exhibits 21-41.pdf(4650363 bytes)

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

BELL'S BREWERY, INC.,)	
)	Opposition No. 91215896
Opposer,)	
)	Application Serial No. 85/929,587
v.)	
)	
INNOVATION BREWING,)	
Applicant.)	
_____)	

APPLICANT'S NOTICE OF RELIANCE

Applicant, Innovation Brewing ("Applicant"), pursuant to Rules 2.120 and 2.122 of the Trademark Rules of Practice, hereby makes the following documents of record and notifies Opposer, Bell's Brewery, Inc. ("Opposer"), of its intent to rely on the following.

I. Discovery Responses and Documents.

Exhibit 1. Pursuant to 37 C.F.R. §2.120(j), a copy of relevant portions of Applicant's First Set of Interrogatories, First Set of Requests for Admissions, and First Set of Requests for Production. The submitted portions of this document show Interrogatory No. 12 and Requests for Admissions Nos. 2, 5, 8, 21, 40, and 50, posed by Applicant and served on Opposer on November 11, 2014.

Exhibit 2. Pursuant to 37 C.F.R. §2.120(j), a copy of Opposer's Response to Applicant's First Set of Interrogatories No. 12, which was sent to Applicant on December 16, 2014.

Exhibit 3. Pursuant to 37 C.F.R. §2.120(j), a copy of Opposer's Responses to Applicant's First Set of Requests for Admissions Nos. 2, 5, 8, 21, 40, and 50, which were sent to Applicant on December 16, 2014.

Exhibit 4. Pursuant to 37 C.F.R. §2.120(j), a copy of relevant portions of Applicant's Second Set of Interrogatories, Second Set of Requests for Admissions, and Second Set of Requests for Production. The submitted portions of this document show Requests for Admissions Nos. 1-60 and 63-67, posed by Applicant and served on Opposer on March 20, 2015,

Exhibit 5. Pursuant to 37 C.F.R. §2.120(j), a copy of Opposer's Answers to Applicant's Second Set of Requests for Admissions Nos. 1-60 and 63-67, which were sent to Applicant on April 24, 2015.

Exhibit 6. Pursuant to 37 C.F.R. §2.120(j), a copy of Opposer's produced document BELLS-000234 – BELLS-000238, which was provided to Applicant on March 20, 2015 as part of Opposer's supplemental document production. BELLS-000234 – BELLS-000238 has been marked as TRADE SECRET/COMMERCIALY SENSITIVE and is being filed under seal.

Exhibit 7. Pursuant to 37 C.F.R. §2.120(j), a copy of Opposer's produced document BELLS-000512, which was provided to Applicant on March 20, 2015 as part of Opposer's supplemental document production. BELLS-000512 has been marked as TRADE SECRET/COMMERCIALY SENSITIVE and is being filed under seal.

Exhibit 8. Pursuant to 37 C.F.R. §2.120(j), a copy of Opposer's produced documents BELLS-02331 – BELLS-02334, which were provided to Applicant on May 7, 2015 as part of Opposer's supplemental document production. BELLS-002331 – BELLS-002334 have

been marked as TRADE SECRET/COMMERCIALY SENSITIVE and are being filed under seal.

II. Third-Party Registrations.

Pursuant to 37 C.F.R. §2.122(e), Applicant submits the following third-party registrations and allowed applications obtained from the United States Trademark Status & Document Retrieval (TSDR) online database, together with supporting documents. The third-party registrations and allowed applications in the first table (Table II.1) are relevant to demonstrate the narrow and limited scope of rights Opposer has in its INSPIRED BREWING mark due to the crowded field of marks that include “inspired,” “inspiration,” and variations thereon for goods and services related to Opposer’s goods. The third-party registrations in the second table (Table II.2) are relevant to demonstrate the narrow and limited scope of rights Opposer has in its purported BOTTLING INNOVATION SINCE 1985 mark due to the crowded field of marks that include “innovations,” “innovative,” and variations thereon for goods and services related to Opposer’s goods. The attached Exhibits include print-outs of the respective TSDR screens and the most recent specimens submitted to the USPTO (if any).

Table II.1

Exhibit	Mark	Application/Registration No.
9	HEINEKEN INSPIRE	3,918,086
10	ROYALLY INSPIRED, COMMONLY ENJOYED	3,945,100
11	THE KIN GROUP - INSPIRE SPIRITS	4,017,912
12	AIR ALCOHOL INSPIRED REFRESHER	4,227,737

Exhibit	Mark	Application/Registration No.
13	4% ALC/VOL 95 CAL* AIR ALCOHOL INSPIRED REFRESHER & Design 	4,310,370
14	INSPIRED BY THE VINE. PERFECTED IN THE BREW KETTLE	4,441,119
15	WORLD INSPIRED OHIO BREWED	4,458,079
16	HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design 	4,536,208
17	INSPIRACION VALDEMAR LAS CANTERAS	4,598,101
18	INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON	4,635,412
19	INSPIRED BY TASTE	4,755,944
20	NATIVE-INSPIRED FOODS & SPIRITS	4,830,684
21	CHALICE DIVINELY INSPIRED	4,998,751
22	INSPIRATION THROUGH FERMENTATION	5,004,388
23	NOVATEUR	86/462,896
24	ISLAND INSPIRED	86/731,313
25	LIFE IS SWEET. BE INSPIRED.	86/797,177

Table II.2

Exhibit	Mark	Registration No.
26	IDRINX THE INNOVATIVE DRINKS COMPANY & Design 	3,340,213

27	BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design 	4,120,237
28	KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING & Design 	4,575,482

III. Print Publications and Internet Materials.

Pursuant to 37 CFR §2.122(e), Applicant submits the following third-party website content. This content from third-party websites is relevant to this proceeding in that it demonstrates the use in commerce of marks containing the words “innovation” or “inspired” and/or variants thereon for beer and related goods and services. This prevalent use of marks containing these terms demonstrates the narrow and limited scope of rights Opposer has in its INSPIRED BREWING mark and in its purported BOTTLING INNOVATION SINCE 1985 mark due to the crowded field of similar marks used for related goods and services.

<u>Exhibit</u>	<u>Company</u>	<u>Mark</u>	<u>Website</u>	<u>Date Printed</u>
29	Blue Moon Brewing Company	CREATIVELY INSPIRED. ARTFULLY BREWED.	https://www.bluemoonbrewingcompany.com	9/27/2016
30	Community Beer Co.	INSPIRATION	http://www.communitybeer.com/inspiration	9/27/2016
31	LTS Brewing Company	INSPIRATION	http://www.ltsbrewing.com/our-craft-beers/	9/27/2016
32	HopCat	INSPIRATION THROUGH FERMENTATION	http://hopcat.tumblr.com	10/17/2014

<u>Exhibit</u>	<u>Company</u>	<u>Mark</u>	<u>Website</u>	<u>Date Printed</u>
33	HopCat	INSPIRATION THROUGH FERMENTATION	http://www.wxyz.com/lifestyle/food/first-look-inside-hopcat-detroit-a-new-bar-and-restaurant-opening-in-december	10/17/2014
34	Tenneyson Absinthe Royale	ROYALLY INSPIRED COMMONLY ENJOYED	http://tenneyson.com/home.html	10/21/2016
35	Columbus Brewing Co.	WORLD INSPIRED OHIO BREWED	https://twitter.com/ColumbusBrewing?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor	10/20/2016
36	Blichmann Engineering	BREWING INNOVATION	http://www.blichmannengineering.com	10/17/2014
37	Lavery Brewing Company	BREWING INNOVATIVE ALES IN SMALL BATCHES	http://www.laverybrewing.com	10/17/2014
38	Clark Brewing Innovations	CLARK BREWING INNOVATIONS	http://www.clarkbrewing.com/Welcome.html	10/17/2014
39	Genuine Innovations	GENUINE INNOVATIONS	http://www.genuineinnovations.com/us/products/tools-accessories/cornelius-keg-co2-charger.php and https://www.bellsbeer.com/store/products/Cornelius-Keg-CO2-Charger.html	10/20/2016
40	Alaskan Brewing Co.	INNOVATION IN TASTE	http://www.alaskanbeer.com/our-brew/rough-drafts.html	10/17/2014
41	MolsonCoors	INNOVATION STARTS AND ENDS WITH OUR BEER DRINKERS. INNOVATION IN MOTION DEDICATION TO INNOVATION	http://www.molsoncoors.com/en/innovation	9/8/2016

DATED this 21st day of October, 2016.

CERTIFICATE OF E-FILING

I hereby certify that this correspondence is being transmitted electronically via the United States Patent and Trademark Office's ESTTA-Web System on October 21, 2016.

/Ian D. Gates/

Ian D. Gates

Respectfully submitted,

DASCENZO INTELLECTUAL
PROPERTY LAW, P.C.

/Ian D. Gates/

Ian D. Gates
Registration No. 51,722
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Portland, Oregon 97205
Telephone: (503) 224-7529
Facsimile: (503) 224-7329

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Applicant's
Notice of Reliance is being served on Opposer by Priority Mail on October 21, 2016 to:

Sarah M. Robertson
Dorsey & Whitney LLP
51 West 52nd Street
New York, NY 10019-6119

/Ian D. Gates/
Ian D. Gates
Of Attorneys for Applicant

Exhibit 1

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

BELL’S BREWERY, INC.,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91215896
)	
INNOVATION BREWING,)	
)	
Applicant.)	
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**APPLICANT’S FIRST SET OF INTERROGATORIES, FIRST SET OF REQUESTS
FOR ADMISSIONS, AND FIRST SET OF REQUESTS FOR PRODUCTION**

Pursuant to Fed. R. Civ. P. 26, 33–34, and 36 and 37 C.F.R. § 2.120, Innovation Brewing (“Applicant”) hereby requests that Bell’s Brewery, Inc. (“Opposer”) answer the following Interrogatories, admit or deny the truth of the following Requests for Admissions, and produce the requested Documents and Things.

INSTRUCTIONS AND DEFINITIONS

The following Interrogatories and Requests are continuing in nature, and in the event that at any later date Opposer obtains additional facts, or forms any conclusion, opinion, or contention in addition to or different from those set forth in its answers, Opposer shall amend its answers promptly and sufficiently in advance of any trial periods, to set forth such additions or differences.

“Opposer” shall mean Bell’s Brewery, Inc., any predecessor or successor thereof, and all of its subsidiaries and affiliated entities, and their present and former officers, directors, employees, agents, representatives, and any other persons or entities acting on behalf of Bell’s Brewery, Inc.

“Documents and Things” means all materials within the full scope of Fed. R. Civ. P. 34, including (but not limited to) all information-containing tangible media in any form, and drafts thereof, including (but not limited to) all writings, notes, notations, correspondence, invoices, contracts, purchase orders, memoranda, books, pamphlets, publications, e-mail, studies, reports, labels, packaging, tags, products, product prototypes, product samples, promotional products, advertisements, brochures, catalogs, artwork, computer files, tear sheets, proofs, displays, photographs, videotapes, models, films, drawings, designs, sketches, illustrative materials, magnetic recording tapes, microfilms and other storage means by which information is retained in retrievable form, written, recorded or reproduced by any mechanical, electronic or magnetic process.

“Identify” means a complete identification to the full extent known or ascertainable by Opposer, whether or not in the possession of Opposer and whether or not alleged to be privileged, including the following information:

1. The present depository or depositories and the name and address of the person or persons having custody of any item to be identified unless the item is a public document, thing, or person.
2. Where the item to be identified is a person, his or her full name, address, job title and present employer.

3. Where the item to be identified is a document or paper, its character, title, date, addressee or recipient, and author, signatory or sender.

4. Where the item to be identified is printed material, its title, author, publication date, volume and the relevant page numbers.

“Person” shall mean and include any natural person, business, or organization such as a corporation, partnership or the like.

“Mark,” as well as “trademark,” means any source identifier, including trademarks, service marks, logos, and slogans.

“And,” as well as “or,” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all documents and things which might otherwise be construed to be outside its scope.

Any word written in the singular herein shall be construed as plural or vice versa when necessary to facilitate Opposer’s responses.

If privilege is alleged as to information or materials or if an Interrogatory or Request is otherwise not answered in full, state the specific grounds for not answering in full and answer said Interrogatory and Request to the extent to which it is not objected, including the identification of all information or materials for which privilege is claimed.

7. Describe how and when Opposer first became aware of Applicant's INNOVATION BREWING mark.

8. Identify all known third party use of marks in the U.S. that include "inspired" or variants thereon, including (without limitation) "inspiration" and "inspire," that are used in connection with the sale of beer or beer-related goods or services

9. With respect to each mark identified in the answer to Interrogatory No. 8, describe in detail whether Opposer has objected to such use, the reasons why Opposer objected or did not object to such use, and the resolution or current status of any objection.

10. Identify all known third party use of marks in the U.S. that include "innovation" or variants thereon, including (without limitation) "innovations," "innovate," and "innovative," that are used in connection with the sale of beer or beer-related goods or services

11. With respect to each mark identified in the answer to Interrogatory No. 10, describe in detail whether Opposer has objected to such use, the reasons why Opposer objected or did not object to such use, and the resolution or current status of any objection.

12. Describe in detail the circumstances surrounding any instances where a person has been confused, mistaken, or deceived in any way as to the identity or source of Opposer's goods or services sold under the INSPIRED BREWING mark and/or the purported BOTTLING INNOVATION SINCE 1985 mark, including (without limitation) instances where a person has been confused, mistaken, or deceived in any way as to the identity or source of goods or services sold under Applicant's INNOVATION BREWING mark.

13. Describe in detail Opposer's planned or proposed future use of the purported BOTTLING INNOVATION SINCE 1985 mark.

APPLICANT'S FIRST SET OF REQUESTS FOR ADMISSIONS

1. Opposer does not have the exclusive right to use the word “innovation” as part of a mark in connection with the sale of beer or beer-related goods or services in the U.S.

2. Other than Applicant, Opposer is not the exclusive party using a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “innovation” or variants thereon, including (without limitation) “innovations,” “innovate,” and “innovative.”

3. Opposer is aware of at least five other parties that use a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “innovation” or variants thereon, including (without limitation) “innovations,” “innovate,” and “innovative.”

4. Opposer is aware of at least three U.S. trademark or service mark registrations owned by third parties for marks that include the word “innovation” or variants thereon, including (without limitation) “innovations,” “innovate,” and “innovative,” and that are registered for beer or beer-related goods or services.

5. With respect to Opposer’s awareness of any third party that has used, uses, registered, or sought registration for a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “innovation” or variants thereon, including (without limitation) “innovations,” “innovate,” and “innovative,” Opposer has not objected to at least a subset of said third party use.

6. With respect to Opposer’s awareness of any third party that uses, has used, has registered, or has sought registration for a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “innovation” or variants thereon, including

(without limitation) “innovations,” “innovate,” and “innovative,” Opposer has not objected to any of said third party use other than with respect to Applicant’s use of the INNOVATION BREWING mark.

7. Opposer does not have the exclusive right to use the word “inspired” as part of a mark in connection with the sale of beer or beer-related goods or services in the U.S.

8. Opposer is not the exclusive party to use a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “inspired” or variants thereon, including (without limitation) “inspiration” and “inspire.”

9. Opposer is aware of at least ten other parties that use a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “inspired” or variants thereon, including (without limitation) “inspiration” and “inspire.”

10. Opposer is aware of at least ten U.S. trademark or service mark registrations owned by third parties for marks that include the word “inspired” or variants thereon, including (without limitation) “inspiration” and “inspire,” and are registered for beer or beer-related goods or services.

11. With respect to Opposer’s awareness of any third party that uses, has used, has registered, or has sought registration for a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “inspired” or variants thereon, including (without limitation) “inspiration” and “inspire,” Opposer has not objected to at least a subset of said third party use.

12. With respect to Opposer’s awareness of any third party that uses, has used, has registered, or has sought registration for a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “inspired” or variants thereon, including

(without limitation) “inspiration” and “inspire,” Opposer has not objected to any of said third party use.

13. Opposer has reviewed Applicant’s Response No. 30 to Opposer’s First Set of Interrogatories.

14. The word “inspired” has a distinct meaning from the word “innovation.”

15. The word “inspired” means “aroused, animated, or imbued with the spirit to do something, by or as if by supernatural or divine influence.”

16. The word “innovation” means “something new or different introduced,” “introduction of new things or methods,” or “the act of innovating.”

17. The word “innovate” means “to introduce something new” or “make changes in anything established.”

18. The word “innovation” has a distinct look from the word “inspired.”

19. The word “innovation” has a distinct sound, when spoken, from the word “inspired.”

20. Opposer has not used the purported BOTTLING INNOVATION SINCE 1985 mark in connection with the sale of beer.

21. Opposer does not use the purported BOTTLING INNOVATION SINCE 1985 mark on labels or packaging for beer and beer-related products.

22. Opposer has no control over the quality of service rendered by Opposer’s distributor or distributors that display the purported BOTTLING INNOVATION SINCE 1985 mark on delivery trucks used to distribute Opposer’s beer products.

40. Opposer's bumper stickers having the purported BOTTLING INNOVATION SINCE 1985 mark are not packaged with Opposer's beer products.

41. Opposer's bumper stickers having the purported BOTTLING INNOVATION SINCE 1985 mark are not distributed with Opposer's beer products.

42. Opposer does not believe that a likelihood of confusion exists between Opposer's INSPIRED BREWING mark and Applicant's INNOVATION BREWING mark.

43. Opposer does not believe that a likelihood of confusion exists between Opposer's purported BOTTLING INNOVATION SINCE 1985 mark and Applicant's INNOVATION BREWING mark.

44. Laura Bell does not believe that a likelihood of confusion exists between Opposer's INSPIRED BREWING mark and Applicant's INNOVATION BREWING mark.

45. Laura Bell does not believe that a likelihood of confusion exists between Opposer's purported BOTTLING INNOVATION SINCE 1985 mark and Applicant's INNOVATION BREWING mark.

46. Larry Bell does not believe that a likelihood of confusion exists between Opposer's INSPIRED BREWING mark and Applicant's INNOVATION BREWING mark.

47. Larry Bell does not believe that a likelihood of confusion exists between Opposer's purported BOTTLING INNOVATION SINCE 1985 mark and Applicant's INNOVATION BREWING mark.

48. Opposer does not use either of the TM or SM symbol in connection with the purported BOTTLING INNOVATION SINCE 1985 mark.

49. Opposer does not use either of the TM or SM symbol in connection with the purported BOTTLING INNOVATION SINCE 1985 mark because Opposer acknowledges that

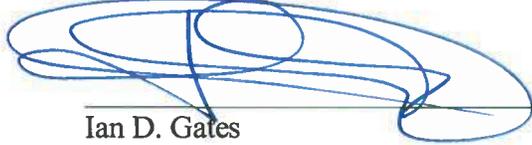
the purported BOTTLING INNOVATION SINCE 1985 mark does not serve as a trademark or service mark for Opposer.

50. All of the documents produced by Opposer in response to Applicant's First Set of Requests for Production are genuine, authentic, true, accurate, and were in the possession, custody, and/or control of Opposer.

DATED this 11th day of November, 2014

Respectfully submitted,

DASCENZO INTELLECTUAL
PROPERTY LAW, P.C.

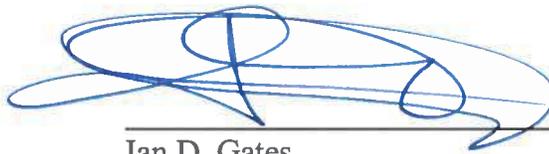
A handwritten signature in blue ink, appearing to be 'Ian D. Gates', is written over a horizontal line. The signature is stylized and somewhat illegible.

Ian D. Gates
Of Attorneys for Opposer
Registration No. 51,722
DASCENZO INTELLECTUAL
PROPERTY LAW, P.C.
1000 SW Broadway, Suite 1555
Portland, Oregon 97205
Telephone: (503) 224-7529
Facsimile: (503) 224-7329

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Applicant's First Set of Interrogatories, First Set of Requests for Admissions, and First Set of Requests for Production is being served on Opposer by First Class Mail and e-mail on its attorney on November 11, 2014 to:

Sarah M. Robertson
Dorsey & Whitney LLP
51 West 52nd Street
New York, NY 10019-6119
e-mail: Robertson.Sarah@dorsey.com



Ian D. Gates
Of Attorneys for Applicant

Exhibit 2

4. Opposer objects to the Interrogatories to the extent they call for the disclosure of information that is insulated from disclosure by the attorney-client and/or work product privileges. This General Objection is incorporated into each and every individual Response set forth below, whether referenced specifically or not.

5. Opposer objects to the Interrogatories to the extent they call for the production of documents and things that concern sales of goods or services outside of the United States, its territories and possessions. This General Objection is incorporated into each and every individual Response set forth below, whether referenced specifically or not.

6. Opposer reserves its right to supplement its Responses to the Interrogatories should additional responsive documents become available.

7. Opposer objects to the Requests to the extent that it is unclear from the form of Applicant's Requests which, if any, instructions and definitions apply to these.

8. Opposer objects to the Requests to the extent that they seek information or documents that came into existence after the date this Opposition was instituted, i.e., April 14, 2014.

RESPONSES AND OBJECTIONS

INTERROGATORY NO. 1:

Describe in detail Opposer's use of the INSPIRED BREWING mark, including (without limitation) the nature of the goods and/or services sold and/or marketed under the mark, the channels of trade of the goods and/or services sold and/or marketed under the mark, the geographic extent of the sale of the goods and/or services sold and/or marketed under the mark, the date of first sale of the goods and/or services sold and/or marketed under the mark, and any period of non-use of the mark.

RESPONSE TO INTERROGATORY NO. 11:

See General Objection Nos. 1, 2 and 8. Opposer further objects to this Request on the basis that Opposer's obligation to disclose responsive information concerning litigation and controversies is more limited than the information Applicant seeks in this request. See Trademark Trial and Appeal Board Manual of Procedure, § 414(10) and cases cited therein. Notwithstanding such objections, and without waiving same, Opposer has no information responsive to this request. See also Response to Interrogatory No. 10.

INTERROGATORY NO. 12:

Describe in detail the circumstances surrounding any instances where a person has been confused, mistaken, or deceived in any way as to the identity or source of Opposer's goods or services sold under the INSPIRED BREWING mark and/or the purported BOTTLING INNOVATION SINCE 1985 mark, including (without limitation) instances where a person has been confused, mistaken, or deceived in any way as to the identity or source of goods or services sold under Applicant's INNOVATION BREWING mark.

RESPONSE TO INTERROGATORY NO. 12:

Opposer has no responsive information to this Interrogatory currently but will supplement this Response in the event this information becomes available.

INTERROGATORY NO. 13:

Describe in detail Opposer's planned or proposed future use of the purported BOTTLING INNOVATION SINCE 1985 mark.

RESPONSE TO INTERROGATORY NO. 13:

Opposer intends to continue its use of its BOTTLING INNOVATION SINCE 1985 mark in connection with the sale and promotion of beer and other products and services.

INTERROGATORY NO. 14:

Describe in detail Opposer's reasons for opposing registration of Applicant's INNOVATION BREWING mark.

RESPONSE TO INTERROGATORY NO. 17:

Opposer states that Laura Bell, Vice-President of Opposer, provided information and/or documents responsive to Applicant's Interrogatories, together with the undersigned counsel.

AS TO OBJECTIONS:

DORSEY & WHITNEY LLP

Dated: December 16, 2014

By  _____
Sarah M. Robertson, Esq.
Bruce R. Ewing
Fara S. Sunderji
51 West 52nd Street
New York, New York 10019
Tel.: (212) 415-9200
E-mail: ny.trademark@dorsey.com

THE FIRM OF HUESCHEN AND SAGE
G. Patrick Sage
Joanna T. French
Seventh Floor, Kalamazoo Building
107 West Michigan Avenue
Kalamazoo, Michigan 49007
Tel.: (269) 382-0030

Attorneys for Opposer,
Bell's Brewery, Inc.

VERIFICATION

I, Laura Bell, declare under penalty of perjury, under the laws of the United States that:

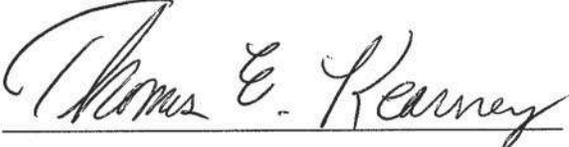
I am the Vice-President of Bell's Brewery, Inc. I have read the foregoing Responses to Applicant's First Set of Interrogatories and know the contents thereof and believe that the same are true based on my personal knowledge, information supplied to me and the books, records and documents maintained by Bell's Brewery, Inc.


LAURA BELL

CERTIFICATE OF SERVICE

I hereby certify that on this 16 day of December, 2014, a copy of the foregoing
OPPOSER'S ANSWERS TO APPLICANT'S FIRST SET OF INTERROGATORIES was
served on Applicant via First Class Mail, postage prepaid to:

Ian D. Gates, Esq.
DASCENZO INTELLECTUAL PROPERTY LAW, P.C.
1000 SW Broadway, Suite 1555
Portland, Oregon 92705



Thomas E. Kearney

Exhibit 3

5. Opposer objects to the Requests to the extent they call for information that is not relevant to the claim or defense of any party.

6. Opposer objects to the Requests to the extent they are vague and ambiguous.

7. Opposer objects to the Requests as unduly burdensome due to their length.

8. Opposer objects to the Requests to the extent that it is unclear from the form of Applicant's Requests which, if any, instructions and definitions apply to these.

9. Opposer objects to the Requests to the extent that they seek information or documents that came into existence after the date this Opposition was instituted, *i.e.*, April 14, 2014.

RESPONSES TO REQUESTS FOR ADMISSIONS

REQUEST NO. 1: Opposer does not have the exclusive right to use the word "innovation" as part of a mark in connection with the sale of beer or beer-related goods or services in the U.S.

RESPONSE:

See General Objection No. 6 as applied to the wording "beer-related goods or services," which is vague and ambiguous. Notwithstanding this objection, and without waiving same, Opposer denies this Request on the basis that Opposer has the exclusive right to use the word "Innovation" as part of the mark BOTTLING INNOVATION SINCE 1985. for, *inter alia*, beer.

REQUEST NO. 2: Other than Applicant, Opposer is not the exclusive party using a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word "innovation" or variants thereon, including (without limitation) "innovations," "innovate," and "innovative."

RESPONSE:

See General Objection No. 6 as applied to the wording "party," "beer-related goods or services" and "variants," which is vague and ambiguous. Notwithstanding this objection, and without waiving same, admitted.

REQUEST NO. 3: Opposer is aware of at least five other parties that use a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “innovation” or variants thereon, including (without limitation) “innovations,” “innovate,” and “innovative.”

RESPONSE:

See General Objection No. 6 as applied to the wording “parties,” “beer-related goods or services,” and “variants,” which is vague and ambiguous. Notwithstanding this objection, and without waiving same, denied.

REQUEST NO. 4: Opposer is aware of at least three U.S. trademark or service mark registrations owned by third parties for marks that include the word “innovation” or variants thereon, including (without limitation) “innovations,” “innovate,” and “innovative,” and that are registered for beer or beer-related goods or services.

RESPONSE:

See General Objection No. 6 as applied to the wording “variants” and “beer-related goods or services,” which is vague and ambiguous. Notwithstanding this objection, and without waiving same, denied.

REQUEST NO. 5: With respect to Opposer’s awareness of any third party that has used, uses, registered, or sought registration for a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “innovation” or variants thereon, including (without limitation) “innovations,” “innovate,” and “innovative,” Opposer has not objected to at least a subset of said third party use.

RESPONSE:

See General Objection No. 6. Admitted.

REQUEST NO. 6: With respect to Opposer’s awareness of any third party that uses, has used, has registered, or has sought registration for a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “innovation” or variants thereon, including (without limitation) “innovations,” “innovate,” and “innovative,” Opposer has not objected to any of said third party use other than with respect to Applicant’s use of the INNOVATION BREWING mark.

RESPONSE:

See General Objection No. 6. Notwithstanding this objection, and without waiving same, denied.

REQUEST NO. 7: Opposer does not have the exclusive right to use the word “inspired” as part of a mark in connection with the sale of beer or beer-related goods or services in the U.S.

RESPONSE:

See General Objection No. 6, as applied to the wording “beer-related goods or services,” which are vague and ambiguous. Notwithstanding this objection, and without waiving same, Opposer denies this Request on the basis that Opposer has the exclusive right to use the word “Inspired” as part of the mark INSPIRED BREWING for, *inter alia*, beer.

REQUEST NO. 8: Opposer is not the exclusive party to use a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “inspired” or variants thereon, including (without limitation) “inspiration” and “inspire.”

RESPONSE:

See General Objection No. 6 as applied to the wording “party,” “beer-related goods or services,” and “variants,” which is vague and ambiguous. Notwithstanding this objection, and without waiving same, admitted.

REQUEST NO. 9: Opposer is aware of at least ten other parties that use a mark in the U.S. in connection with the sale of beer or beer-related goods or services that includes the word “inspired” or variants thereon, including (without limitation) “inspiration” and “inspire.”

RESPONSE:

See General Objection No. 6 as applied to the wording “parties,” “beer-related goods or services,” and “variants,” which is vague and ambiguous. Notwithstanding this objection, and without waiving same, denied.

REQUEST NO. 10: Opposer is aware of at least ten U.S. trademark or service mark registrations owned by third parties for marks that include the word “inspired” or variants thereon, including (without limitation) “inspiration” and “inspire,” and are registered for beer or beer-related goods or services.

RESPONSE:

Denied.

REQUEST NO. 21: Opposer does not use the purported BOTTLING INNOVATION SINCE 1985 mark on labels or packaging for beer and beer-related products.

RESPONSE:

See General Objection No. 6. Notwithstanding such objection, and without waiving same, admitted.

REQUEST NO. 22: Opposer has no control over the quality of service rendered by Opposer's distributor or distributors that display the purported BOTTLING INNOVATION SINCE 1985 mark on delivery trucks used to distribute Opposer's beer products.

RESPONSE:

See General Objection No. 5. Notwithstanding this objection, and without waiving same, denied.

REQUEST NO. 23: Opposer has not entered into a license agreement with Opposer's distributor or distributors for the use of the purported BOTTLING INNOVATION SINCE 1985 mark on delivery trucks used to distribute Opposer's beer products.

RESPONSE:

See General Objection No. 5. Notwithstanding this objection, and without waiving same, denied.

REQUEST NO. 24: Any agreement Opposer has with Opposer's distributor or distributors that display the purported BOTTLING INNOVATION SINCE 1985 mark on delivery trucks used to distribute Opposer's beer products does not include a quality control clause, in which Opposer has the right to revoke the distributor's or distributors' license or use of the purported BOTTLING INNOVATION SINCE 1985 mark based on the quality of the distributor's or distributors' services.

RESPONSE:

See General Objection Nos. 5 and 6. Notwithstanding these objections, and without waiving same, denied.

REQUEST NO. 25: Opposer has a desire to use the INNOVATION BREWING mark.

REQUEST NO. 36: The purported BOTTLING INNOVATION SINCE 1985 mark is a laudatory phrase.

RESPONSE:

Denied.

REQUEST NO. 37: The purported BOTTLING INNOVATION SINCE 1985 mark conveys a message about Opposer.

RESPONSE:

See General Objection No. 6, to the extent the word “message” is vague and ambiguous.

Notwithstanding this objection, and without waiving same, Opposer states that Opposer’s mark serves as an identification of source for Opposer’s goods and services. On this basis, the Request is admitted.

REQUEST NO. 38: The purported BOTTLING INNOVATION SINCE 1985 mark does not serve as a source identifier.

RESPONSE:

Denied.

REQUEST NO. 39: Opposer’s bumper stickers having the purported BOTTLING INNOVATION SINCE 1985 mark are not sold with Opposer’s beer products.

RESPONSE:

Denied.

REQUEST NO. 40: Opposer’s bumper stickers having the purported BOTTLING INNOVATION SINCE 1985 mark are not packaged with Opposer’s beer products.

RESPONSE:

See General Objection No. 6. Notwithstanding such objection, and without waiving same, admitted.

REQUEST NO. 41: Opposer’s bumper stickers having the purported BOTTLING INNOVATION SINCE 1985 mark are not distributed with Opposer’s beer products.

REQUEST NO. 46: Larry Bell does not believe that a likelihood of confusion exists between Opposer's INSPIRED BREWING mark and Applicant's INNOVATION BREWING mark.

RESPONSE:

See General Objection No. 5, on the basis that the personal opinion of Larry Bell is irrelevant to the issues raised in this proceeding. Notwithstanding such objection, and without waiving same, denied.

REQUEST NO. 47: Larry Bell does not believe that a likelihood of confusion exists between Opposer's purported BOTTLING INNOVATION SINCE 1985 mark and Applicant's INNOVATION BREWING mark.

RESPONSE:

See General Objection No. 5, on the basis that the personal opinion of Larry Bell is irrelevant to the issues raised in this proceeding. Notwithstanding such objection, and without waiving same, denied.

REQUEST NO. 48: Opposer does not use either of the TM or SM symbol in connection with the purported BOTTLING INNOVATION SINCE 1985 mark.

RESPONSE:

Admitted.

REQUEST NO. 49: Opposer does not use either of the TM or SM symbol in connection with the purported BOTTLING INNOVATION SINCE 1985 mark because Opposer acknowledges that the purported BOTTLING INNOVATION SINCE 1985 mark does not serve as a trademark or service mark for Opposer.

RESPONSE:

Denied.

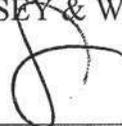
REQUEST NO. 50: All of the documents produced by Opposer in response to Applicant's First Set of Requests for Production are genuine, authentic, true, accurate, and were in the possession, custody, and/or control of Opposer.

RESPONSE:

Admitted.

DORSEY & WHITNEY LLP

Dated: December 16, 2014

By  _____
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Attorneys for Opposer,
Bell's Brewery, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 16 day of December, 2014, a copy of the foregoing
OPPOSER'S RESPONSES TO APPLICANT'S FIRST SET OF REQUESTS FOR
ADMISSION was served on Applicant via First Class Mail, postage prepaid to:

Ian D. Gates, Esq.
DASCENZO INTELLECTUAL PROPERTY LAW, P.C.
1000 SW Broadway, Suite 1555
Portland, Oregon 97205

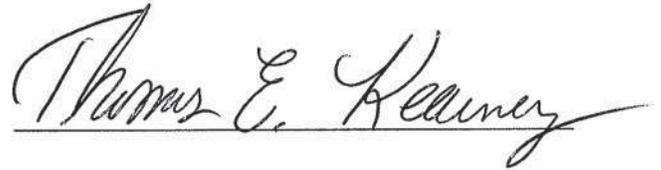
A handwritten signature in cursive script, reading "Thomas E. Keaney", written over a horizontal line.

Exhibit 4

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

BELL’S BREWERY, INC.,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91215896
)	
INNOVATION BREWING,)	
Applicant.)	
_____)	

**APPLICANT’S SECOND SET OF INTERROGATORIES, SECOND SET OF
REQUESTS FOR ADMISSIONS, AND SECOND SET OF REQUESTS FOR
PRODUCTION**

Pursuant to Fed. R. Civ. P. 26, 33–34, and 36 and 37 C.F.R. § 2.120, Innovation Brewing (“Applicant”) hereby requests that Bell’s Brewery, Inc. (“Opposer”) answer the following Interrogatories, admit or deny the truth of the following Requests for Admissions, and produce the requested Documents and Things.

INSTRUCTIONS AND DEFINITIONS

The following Interrogatories and Requests are continuing in nature, and in the event that at any later date Opposer obtains additional facts, or forms any conclusion, opinion, or contention in addition to or different from those set forth in its answers, Opposer shall amend its answers promptly and sufficiently in advance of any trial periods, to set forth such additions or differences.

“Opposer” shall mean Bell’s Brewery, Inc., any predecessor or successor thereof, and all of its subsidiaries and affiliated entities, and their present and former officers, directors, employees, agents, representatives, and any other persons or entities acting on behalf of Bell’s Brewery, Inc.

“Documents and Things” means all materials within the full scope of Fed. R. Civ. P. 34, including (but not limited to) all information-containing tangible media in any form, and drafts thereof, including (but not limited to) all writings, notes, notations, correspondence, invoices, contracts, purchase orders, memoranda, books, pamphlets, publications, e-mail, studies, reports, labels, packaging, tags, products, product prototypes, product samples, promotional products, advertisements, brochures, catalogs, artwork, computer files, tear sheets, proofs, displays, photographs, videotapes, models, films, drawings, designs, sketches, illustrative materials, magnetic recording tapes, microfilms and other storage means by which information is retained in retrievable form, written, recorded or reproduced by any mechanical, electronic or magnetic process.

“Identify” means a complete identification to the full extent known or ascertainable by Opposer, whether or not in the possession of Opposer and whether or not alleged to be privileged, including the following information:

1. The present depository or depositories and the name and address of the person or persons having custody of any item to be identified unless the item is a public document, thing, or person.
2. Where the item to be identified is a person, his or her full name, address, job title and present employer.

3. Where the item to be identified is a document or paper, its character, title, date, addressee or recipient, and author, signatory or sender.

4. Where the item to be identified is printed material, its title, author, publication date, volume and the relevant page numbers.

“Person” shall mean and include any natural person, business, or organization such as a corporation, partnership or the like.

“Mark,” as well as “trademark,” means any source identifier, including trademarks, service marks, logos, and slogans.

“And,” as well as “or,” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all documents and things which might otherwise be construed to be outside its scope.

Any word written in the singular herein shall be construed as plural or vice versa when necessary to facilitate Opposer’s responses.

If privilege is alleged as to information or materials or if an Interrogatory or Request is otherwise not answered in full, state the specific grounds for not answering in full and answer said Interrogatory and Request to the extent to which it is not objected, including the identification of all information or materials for which privilege is claimed.

APPLICANT'S SECOND SET OF REQUESTS FOR ADMISSIONS

1. Opposer has not objected to use or registration of the HEINEKEN INSPIRE mark, registered as U.S. Trademark Registration No. 3,918,086.

2. Opposer has no plans to object to use or registration of the HEINEKEN INSPIRE mark, registered as U.S. Trademark Registration No. 3,918,086.

3. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the HEINEKEN INSPIRE, registered as U.S. Trademark Registration No. 3,918,086.

4. Opposer has not objected to use or registration of the THE KIN GROUP – INSPIRE SPIRITS mark, registered as U.S. Trademark Registration No. 4,017,912.

5. Opposer has no plans to object to use or registration of the THE KIN GROUP – INSPIRE SPIRITS mark, registered as U.S. Trademark Registration No. 4,017,912.

6. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the THE KIN GROUP – INSPIRE SPIRITS mark, registered as U.S. Trademark Registration No. 4,017,912.

7. Opposer has not objected to use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark, registered as U.S. Trademark Registration No. 4,227,737.

8. Opposer has no plans to object to use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark, registered as U.S. Trademark Registration No. 4,227,737.

9. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark, registered as U.S. Trademark Registration No. 4,227,737.

10. Opposer has not objected to use or registration of the WORLD INSPIRED OHIO BREWED mark, registered as U.S. Trademark Registration No. 4,458,079.

11. Opposer has no plans to object to use or registration of the WORLD INSPIRED OHIO BREWED mark, registered as U.S. Trademark Registration No. 4,458,079.

12. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the WORLD INSPIRED OHIO BREWED mark, registered as U.S. Trademark Registration No. 4,458,079.

13. Opposer has not objected to use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE mark, registered as U.S. Trademark Registration No. 4,536,208.

14. Opposer has no plans to object to use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE mark, registered as U.S. Trademark Registration No. 4,536,208.

15. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE mark, registered as U.S. Trademark Registration No. 4,536,208.

16. Opposer has not objected to use or registration of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG mark, previously registered as U.S. Trademark Registration No. 3,434,135.

17. Opposer has no plans to object to use or registration of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG mark, previously registered as U.S. Trademark Registration No. 3,434,135.

18. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG mark, previously registered as U.S. Trademark Registration No. 3,434,135.

19. Opposer has not objected to use or registration of the IDRINX THE INNOVATIVE DRINKS COMPANY mark, previously registered as U.S. Trademark Registration No. 3,340,213.

20. Opposer has no plans to object to use or registration of the IDRINX THE INNOVATIVE DRINKS COMPANY mark, previously registered as U.S. Trademark Registration No. 3,340,213.

21. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the IDRINX THE INNOVATIVE DRINKS COMPANY mark, previously registered as U.S. Trademark Registration No. 3,340,213.

22. Opposer has not objected to use or registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS mark, registered as U.S. Trademark Registration No. 4,120,237.

23. Opposer has no plans to object to use or registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS mark, registered as U.S. Trademark Registration No. 4,120,237.

24. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS mark, registered as U.S. Trademark Registration No. 4,120,237.

25. Opposer has not objected to use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. mark, registered as U.S. Trademark Registration No. 4,575,482.

26. Opposer has no plans to object to use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. mark, registered as U.S. Trademark Registration No. 4,575,482.

27. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. mark, registered as U.S. Trademark Registration No. 4,575,482.

28. Opposer has not objected to use or registration of the CHALICE DIVINELY INSPIRED mark, subject of U.S. Trademark Application Serial No. 86264467.

29. Opposer has no plans to object to use or registration of the CHALICE DIVINELY INSPIRED mark, subject of U.S. Trademark Application Serial No. 86264467.

30. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the CHALICE DIVINELY INSPIRED mark, subject of U.S. Trademark Application Serial No. 86264467.

31. Opposer has not objected to use or registration of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON mark, registered as U.S. Trademark Registration No. 4,635,412.

32. Opposer has no plans to object to use or registration of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON mark, registered as U.S. Trademark Registration No. 4,635,412.

33. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON mark, registered as U.S. Trademark Registration No. 4,635,412.

34. Opposer has not objected to use of the CLARK BREWING INNOVATIONS mark by Clark Brewing Innovations, such as is displayed at www.clarkbrewing.com.

35. Opposer has no plans to object to use of the CLARK BREWING INNOVATIONS mark by Clark Brewing Innovations, such as is displayed at www.clarkbrewing.com.

36. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the CLARK BREWING INNOVATIONS mark by Clark Brewing Innovations, such as is displayed at www.clarkbrewing.com.

37. Opposer has not objected to use of the BREWING INNOVATION mark by Blichmann Engineering, such as is displayed at www.blichmannengineering.com.

38. Opposer has no plans to object to use of the BREWING INNOVATION mark by Blichmann Engineering, such as is displayed at www.blichmannengineering.com.

39. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the BREWING INNOVATION mark by Blichmann Engineering, such as is displayed at www.blichmannengineering.com.

40. Opposer has not objected to use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark by Lavery Brewing Company, such as is displayed at www.laverybrewing.com.

41. Opposer has no plans to object to use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark by Lavery Brewing Company, such as is displayed at www.laverybrewing.com.

42. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark by Lavery Brewing Company, such as is displayed at www.laverybrewing.com.

43. Opposer has not objected to use of the INNOVATION IN TASTE mark by Alaskan Brewing Co., such as is displayed at www.alaskanbeer.com/our-brew/rough-drafts.html.

44. Opposer has no plans to object to use of the INNOVATION IN TASTE mark by Alaskan Brewing Co., such as is displayed at www.alaskanbeer.com/our-brew/rough-drafts.html.

45. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION IN TASTE mark by Alaskan Brewing Co., such as is displayed at www.alaskanbeer.com/our-brew/rough-drafts.html.

46. Opposer has not objected to use of the INNOVATION BREW WORKS mark by Innovation Brew Works, such as is displayed at www.ibrewworks.com.

47. Opposer has no plans to object to use of the INNOVATION BREW WORKS mark by Innovation Brew Works, such as is displayed at www.ibrewworks.com.

48. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION BREW WORKS mark by Innovation Brew Works, such as is displayed at www.ibrewworks.com.

49. Opposer has not objected to use of the INSPIRATION THROUGH FERMENTATION mark by HopCat, such as is displayed at hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/1Icu5j>.

50. Opposer has no plans to object to use of the INSPIRATION THROUGH FERMENTATION mark by HopCat, such as is displayed at hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/1Icu5j>.

51. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INSPIRATION THROUGH FERMENTATION mark by HopCat, such as is displayed at hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/1Icu5j>.

52. Opposer has not objected to use of the INNOVATION mark by MillerCoors, such as is displayed at www.millercoors.com/Our-Beers/Innovation.aspx.

53. Opposer has no plans to object to use of the INNOVATION mark by MillerCoors, such as is displayed at www.millercoors.com/Our-Beers/Innovation.aspx.

54. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION mark by MillerCoors, such as is displayed at www.millercoors.com/Our-Beers/Innovation.aspx.

55. Opposer has not objected to use of the INNOVATION mark by InBev, such as is displayed at www.ab-inbev.com/innovation.html.

56. Opposer has no plans to object to use of the INNOVATION mark by InBev, such as is displayed at www.ab-inbev.com/innovation.html.

57. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION mark by InBev, such as is displayed at www.ab-inbev.com/innovation.html.

58. Opposer has not objected to use of the INNOVATION STARTS AND ENDS WITH OUR BEER DRINKERS. mark, the INNOVATION IN MOTION mark, and the DEDICATION TO INNOVATION mark by MolsonCoors, such as is displayed at www.molsoncoors.com/en/innovation.aspx.

59. Opposer has no plans to object to use of the INNOVATION STARTS AND ENDS WITH OUR BEER DRINKERS. mark, the INNOVATION IN MOTION mark, and the DEDICATION TO INNOVATION mark by MolsonCoors, such as is displayed at www.molsoncoors.com/en/innovation.aspx.

60. Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION STARTS AND ENDS WITH OUR BEER DRINKERS. mark, the INNOVATION IN MOTION mark, and the DEDICATION TO INNOVATION mark by MolsonCoors, such as is displayed at www.molsoncoors.com/en/innovation.aspx.

61. Opposer believes that to successfully protect one's rights to a trademark, one must object to use of similar trademarks by third parties.

62. Opposer believes that to successfully protect one's rights to a trademark, one must object to registration of similar trademarks by third parties.

63. Opposer has been brewing beer since 1985.

64. Opposer has been bottling beer since 1985.

65. Opposer has been selling bottled beer since 1985.

66. Opposer has been selling beer since 1985.

67. The word "inspired" has the same meaning as the word "innovation."

68. The word "inspired" has a different meaning than the word "innovation."

DATED this 20th day of March, 2015

Respectfully submitted,

DASCENZO INTELLECTUAL
PROPERTY LAW, P.C.

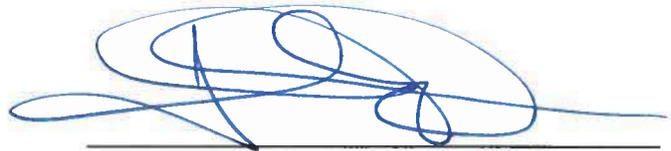


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PROPERTY LAW, P.C.
1000 SW Broadway, Suite 1555
Portland, Oregon 97205
Telephone: (503) 224-7529
Facsimile: (503) 224-7329

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Applicant's Second Set of Interrogatories, Second Set of Requests for Admissions, and Second Set of Requests for Production is being served on Opposer by First Class Mail on March 20, 2015 to:

Sarah M. Robertson
Dorsey & Whitney LLP
51 West 52nd Street
New York, NY 10019-6119



Ian D. Gates
Of Attorneys for Applicant

Exhibit 5

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

Bell's Brewery, Inc.,)	
)	
v.)	Opposition No. 91215896
)	
Opposer,)	
)	
Innovation Brewing,)	
)	
Applicant.)	
)	

**OPPOSER'S RESPONSES TO APPLICANT'S
SECOND SET OF REQUESTS FOR ADMISSIONS**

Opposer, Bell's Brewery, Inc., ("Bell's") objects to the Second Set of Requests for Admissions served by Applicant, Innovation Brewing ("Applicant") to the extent the definitions and instructions request Bell's to furnish information beyond the requirements of the Federal Rules of Civil Procedure and the Trademark Rules of Practice. Bell's will respond to Applicant's Second Set of Requests for Admissions (the "Requests for Admissions") in accordance with and to the extent required by, the Federal Rules of Civil Procedure and the Trademark Rules of Practice.

Bell's also objects to the Requests for Admissions to the extent that they call for information that is subject to the attorney-client privilege or constitutes attorney work product.

REQUEST FOR ADMISSION NO. 1:

Opposer has not objected to use or registration of the HEINEKEN INSPIRE mark, registered as U.S. Trademark Registration No. 3,918,086.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Bell's objects to Request 1 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the HEINEKEN INSPIRE mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different

commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas the dominant portion of the HEINEKEN INSPIRE mark is the famous and distinctive HEINEKEN mark, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has not objected to the use or registration of the HEINEKEN INSPIRE mark.

REQUEST FOR ADMISSION NO. 2:

Opposer has no plans to object to use or registration of the HEINEKEN INSPIRE mark, registered as U.S. Trademark Registration No. 3,918,086.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Bell's objects to Request 2 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the HEINEKEN INSPIRE mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 1 above). When compared in their entities, the HEINEKEN INSPIRE mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas the dominant portion of the HEINEKEN INSPIRE mark is the famous and distinctive HEINEKEN mark, which is not contained in Bell's' mark. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the use or registration of the HEINEKEN INSPIRE mark.

REQUEST FOR ADMISSION NO 3:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the HEINEKEN INSPIRE [sic], registered as U.S. Trademark Registration No. 3,918,086.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Bell's objects to Request 3 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the HEINEKEN INSPIRE mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 1 above). Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

When compared in their entities, the HEINEKEN INSPIRE mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the first and dominant portion of Bell's' mark is INSPIRED, and the first and dominant portion of the HEINEKEN INSPIRE mark is the famous and distinctive HEINEKEN mark, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use or registration of the HEINEKEN INSPIRE mark.

REQUEST FOR ADMISSION NO. 4:

Opposer has not objected to use or registration of the THE KIN GROUP – INSPIRE SPIRITS mark, registered as U.S. Trademark Registration No. 4,017,912.

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Bell's objects to Request 4 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the THE KIN GROUP - INSPIRE SPIRITS mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas the dominant portion of the THE KIN GROUP - INSPIRE SPIRITS mark is the phrase THE KIN GROUP, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has not objected to the registration of the THE KIN GROUP - INSPIRE SPIRITS mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, it does not appear that the THE KIN GROUP – INSPIRE SPIRITS is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 5:

Opposer has no plans to object to use or registration of the THE KIN GROUP – INSPIRE SPIRITS mark, registered as U.S. Trademark Registration No. 4,017,912.

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

Bell's objects to Request 5 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the THE KIN GROUP - INSPIRE SPIRITS mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 4 above). Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

When compared in their entities, the THE KIN GROUP - INSPIRE SPIRITS mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas the dominant portion of the THE KIN GROUP - INSPIRE SPIRITS mark is the phrase THE KIN GROUP, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the registration of the THE KIN GROUP - INSPIRE SPIRITS mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, it does not appear that the THE KIN GROUP - INSPIRE SPIRITS is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 6:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the THE KIN GROUP - INSPIRE SPIRITS mark, registered as U.S. Trademark Registration No. 4,017,912.

RESPONSE TO REQUEST FOR ADMISSION NO. 6:

Bell's objects to Request 6 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the THE KIN GROUP - INSPIRE SPIRITS mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 4 above). Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

When compared in their entities, the THE KIN GROUP - INSPIRE SPIRITS mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, and the dominant portion of the THE KIN GROUP - INSPIRE SPIRITS mark is the phrase THE KIN GROUP, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the registration of the THE KIN GROUP - INSPIRE SPIRITS mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, it does not appear that THE KIN GROUP - INSPIRE SPIRITS is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of

this request.

REQUEST FOR ADMISSION NO. 7:

Opposer has not objected to use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark, registered as U.S. Trademark Registration No. 4,227,737.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

Bell's objects to Request 7 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the AIR ALCOHOL INSPIRED REFRESHER mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas the dominant portion of the AIR ALCOHOL INSPIRED REFRESHER mark is the word AIR, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has not objected to the use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark.

REQUEST FOR ADMISSION NO. 8:

Opposer has no plans to object to use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark, registered as U.S. Trademark Registration No. 4,227,737.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Bell's objects to Request 8 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the AIR ALCOHOL INSPIRED REFRESHER mark are irrelevant. This request is also irrelevant because the marks are

not similar (see response to Request 7 above). Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

When compared in their entities, the AIR ALCOHOL INSPIRED REFRESHER mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas the dominant portion of the AIR ALCOHOL INSPIRED REFRESHER mark is the word AIR, which is not contained in Bell's' mark. Subject to the foregoing objections, Bell's admits that it has no plans to object to the use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark.

REQUEST FOR ADMISSION NO. 9:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark, registered as U.S. Trademark Registration No. 4,227,737.

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Bell's objects to Request 9 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the AIR ALCOHOL INSPIRED REFRESHER mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 7 above). Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity. When compared in their entities, the AIR ALCOHOL INSPIRED REFRESHER mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas and the dominant portion of the AIR ALCOHOL INSPIRED REFRESHER mark is the term AIR, which is not contained in Bell's' mark. Additionally, this

third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use or registration of the AIR ALCOHOL INSPIRED REFRESHER mark.

REQUEST FOR ADMISSION NO. 10:

Opposer has not objected to use or registration of the WORLD INSPIRED OHIO BREWED mark, registered as U.S. Trademark Registration No. 4,458,079.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Bell's objects to Request 10 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the WORLD INSPIRED OHIO BREWED mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas the dominant portion of the WORLD INSPIRED OHIO BREWED mark is the unitary phrase WORLD INSPIRED, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has not objected to the use or registration of the WORLD INSPIRED OHIO BREWED mark.

REQUEST FOR ADMISSION NO. 11:

Opposer has no plans to object to use or registration of the WORLD INSPIRED OHIO BREWED mark, registered as U.S. Trademark Registration No. 4,458,079.

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

Bell's objects to Request 11 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's plans or lack thereof with regards to the WORLD INSPIRED OHIO BREWED mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 10 above). When compared in their entities, the WORLD INSPIRED OHIO BREWED mark and Bell's INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's mark is INSPIRED, whereas the dominant portion of the WORLD INSPIRED OHIO BREWED mark is the unitary phrase WORLD INSPIRED, which is not contained in Bell's mark. Additionally, this third-party mark is not similar to Bell's BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the use or registration of the WORLD INSPIRED OHIO BREWED mark.

REQUEST FOR ADMISSION NO. 12:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the WORLD INSPIRED OHIO BREWED mark, registered as U.S. Trademark Registration No. 4,458,079.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Bell's objects to Request 12 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the WORLD INSPIRED OHIO BREWED mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 10 above). When compared in their entities, the WORLD INSPIRED OHIO BREWED mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED, whereas the dominant portion of the WORLD INSPIRED OHIO BREWED mark is the unitary phrase WORLD INSPIRED, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use or registration of the WORLD INSPIRED OHIO BREWED mark.

REQUEST FOR ADMISSION NO. 13:

Opposer has not objected to use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE mark, registered as U.S. Trademark Registration No. 4,536,208.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Bell's objects to Request 13 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the HAYES' INSPIRED OLD ALE

PUBLIC HOUSE & Design mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED whereas the dominant portion of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark is the distinctive name HAYES', which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has not objected to the use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark.

REQUEST FOR ADMISSION NO. 14:

Opposer has no plans to object to use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE mark, registered as U.S. Trademark Registration No. 4,536,208.

RESPONSE TO REQUEST FOR ADMISSION NO. 14:

Bell's objects to Request 14 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 13 above). When compared in their entities, the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark is the distinctive name HAYES', which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark.

REQUEST FOR ADMISSION NO. 15

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE mark, registered as U.S. Trademark Registration No. 4,536,208.

RESPONSE TO REQUEST FOR ADMISSION NO. 15:

Bell's objects to Request 15 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 13 above). When compared in their entities, the HAYES' INSPIRED OLD ALE PUBLIC HOUSE mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark is the distinctive name HAYES', which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use or registration of the HAYES' INSPIRED OLD ALE PUBLIC HOUSE & Design mark.

REQUEST FOR ADMISSION NO. 16:

Opposer has not objected to use or registration of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELONGJIANG mark, previously registered as U.S. Trademark Registration No. 3,434,135.

RESPONSE TO REQUEST FOR ADMISSION NO. 16:

Bell's objects to Request 16 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN

PROVINCE OF HELLONGJIANG & Design mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark is the distinctive name HARBIN, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has not objected to the use or registration of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark.

REQUEST FOR ADMISSION NO. 17:

Opposer has no plans to object to use or registration of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG mark, previously registered as U.S. Trademark Registration No. 3,434,135.

RESPONSE TO REQUEST FOR ADMISSION NO. 17:

Bell's objects to Request 17 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the HARBIN IMPORTED

LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 16 above). When compared in their entities, the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark is the distinctive name HARBIN, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity. Bell's further objects to this request on the grounds that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because one cannot object to a cancelled trademark registration and U.S. Trademark Registration No. 3,434,135 was cancelled on January 2, 2015. Further still, after a reasonable search, it does not appear that the mark is currently being used in the United States. Thus, it appears there is nothing to which to object. As a result, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 18:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG mark, previously registered as U.S. Trademark Registration No. 3,434,135.

RESPONSE TO REQUEST FOR ADMISSION NO. 18:

Bell's objects to Request 18 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 16 above). When compared in their entities, the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark is the distinctive name HARBIN, which is not contained in Bell's' mark. Additionally, this third-party

mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark and that it had no plans to object to the registration of the HARBIN IMPORTED LAGER INSPIRED BY THE TRADITION AND CULTURE OF CHINA'S MOST NORTHERN PROVINCE OF HELLONGJIANG & Design mark prior to January 2, 2015. Bell's further objects to this request on the grounds that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because one cannot object to a cancelled registration and U.S. Trademark Registration No. 3,434,135 was cancelled on January 2, 2015. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 19:

Opposer has not objected to use or registration of the IDRINX THE INNOVATIVE DRINKS COMPANY mark, previously registered as U.S. Trademark Registration No. 3,340,213.

RESPONSE TO REQUEST FOR ADMISSION NO. 19:

Bell's objects to Request 19 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark, as shown here:



, and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark is the fanciful and distinctive term IDRINX, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Subject to the foregoing objections, Bell's admits that it has not objected to the use or registration of the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark.

REQUEST FOR ADMISSION NO. 20:

Opposer has no plans to object to use or registration of the IDRINX THE INNOVATIVE DRINKS COMPANY mark, previously registered as U.S. Trademark Registration No. 3,340,213.

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Bell's objects to Request 20 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 19 above). When compared in their entities, the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark, as shown here:



, and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark is the fanciful and distinctive term IDRINX, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to use of the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark. Bell's further objects to this request on the grounds that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because one cannot object to a cancelled registration and U.S. Trademark Registration No. 3,340,213 was cancelled on June 27, 2014. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 21:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the IDRINX THE INNOVATIVE DRINKS COMPANY mark, previously registered as U.S. Trademark Registration No. 3,340,213.

RESPONSE TO REQUEST FOR ADMISSION NO. 21:

Bell's objects to Request 21 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of

admissible evidence because Bell's' plans or lack thereof with regards to the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 19 above). When compared in their entities, the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark, as shown here:



, and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark is the fanciful and distinctive term IDRINX, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use of the IDRINX THE INNOVATIVE DRINKS COMPANY & Design mark and had no plans to object to the registration of the mark before June 27, 2014. Bell's further objects to this request on the grounds that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because one cannot object to a cancelled registration and U.S. Trademark Registration No. 3,340,213 was cancelled on June 27, 2014. As a result, Bell's is unable to admit or deny the remainder of this

request.

REQUEST FOR ADMISSION NO. 22:

Opposer has not objected to use or registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS mark, registered as U.S. Trademark Registration No. 4,120,237.

RESPONSE TO REQUEST FOR ADMISSION NO. 22:

Bell's objects to Request 22 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark, as shown here:

barth!nnovations

unlocking the potential of hops , and Bell's' BOTTLING INNOVATION SINCE 1985

mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark is the distinctive term BARTH, which is not contained in Bell's' mark. The BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark is also not registered for use in connection with beer, but a wide variety of entirely unrelated services in Classes 38, 41, 42 and 44. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Subject to the foregoing objections, Bell's admits that it has not objected to the registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, is does not appear that the BARTH !NNOVATIONS UNLOCKING THE

POTENTIAL OF HOPS & Design Mark is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 23:

Opposer has no plans to object to use or registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS mark, registered as U.S. Trademark Registration No. 4,120,237.

RESPONSE TO REQUEST FOR ADMISSION NO. 23:

Bell's objects to Request 23 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 22 above).

When compared in their entities, the BARTH !NNOVATIONS UNLOCKING THE



POTENTIAL OF HOPS & Design mark, as shown here:

and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark is the distinctive term BARTH, which is not contained in Bell's' mark. The BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark is also not registered for use in connection with beer, but a wide variety of entirely unrelated services in Classes 38, 41, 42 and 44. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information

that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, it does not appear that the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 24:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS mark, registered as U.S. Trademark Registration No. 4,120,237.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Bell's objects to Request 24 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 22 above). When compared in their entities, the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark, as shown here:

barth!nnovations

unlocking the potential of hops , and Bell's' BOTTLING INNOVATION SINCE 1985

mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the BARTH !NNOVATIONS UNLOCKING THE

POTENTIAL OF HOPS & Design mark is the distinctive term BARTH, which is not contained in Bell's' mark. The BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark is also not registered for use in connection with beer, but a wide variety of entirely unrelated services in Classes 38, 41, 42 and 44. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the registration of the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, is does not appear that the BARTH !NNOVATIONS UNLOCKING THE POTENTIAL OF HOPS & Design mark is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 25:

Opposer has not objected to use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. mark, registered as U.S. Trademark Registration No. 4,575,482.

RESPONSE TO REQUEST FOR ADMISSION NO. 25:

Bell's objects to Request 25 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark, as shown here:



, and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark is the distinctive and well-known name KIRIN, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Subject to the foregoing objections, Bell's admits that it has not objected to the use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark.

REQUEST FOR ADMISSION NO. 26:

Opposer has no plans to object to use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. mark, registered as U.S. Trademark Registration No. 4,575,482.

RESPONSE TO REQUEST FOR ADMISSION NO. 26:

Bell's objects to Request 26 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A

REFRESHING FROZEN FOAM TOPPING. & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 25 above). When compared in their entities, the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark, as shown here:



, and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark is the distinctive and well-known name KIRIN, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark.

REQUEST FOR ADMISSION NO. 27:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. mark, registered as U.S. Trademark Registration No. 4,575,482.

RESPONSE TO REQUEST FOR ADMISSION NO. 27:

Bell's objects to Request 27 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 25 above). When compared in their entities, the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark, as shown here:



, and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark is the distinctive and well-known name KIRIN, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED

BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use or registration of the KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING. & Design mark.

REQUEST FOR ADMISSION NO. 28:

Opposer has not objected to use or registration of the CHALICE DIVINELY INSPIRED mark, subject of U.S. Trademark Application Serial No. 86264467.

RESPONSE TO REQUEST FOR ADMISSION NO. 28:

Bell's objects to Request 28 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the CHALICE DIVINELY INSPIRED mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the CHALICE DIVINELY INSPIRED mark is the first word CHALICE, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has not objected to the registration of the CHALICE DIVINELY INSPIRED mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, it does not appear that the CHALICE DIVINELY

INSPIRED is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 29:

Opposer has no plans to object to use or registration of the CHALICE DIVINELY INSPIRED mark, subject of U.S. Trademark Application Serial No. 86264467.

RESPONSE TO REQUEST FOR ADMISSION NO. 29:

Bell's objects to Request 29 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the CHALICE DIVINELY INSPIRED mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 28 above). When compared in their entities, the CHALICE DIVINELY INSPIRED mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the CHALICE DIVINELY INSPIRED mark is the first word CHALICE, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the registration of the CHALICE DIVINELY INSPIRED mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, it does not appear that CHALICE DIVINELY INSPIRED is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 30:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the CHALICE DIVINELY INSPIRED mark, subject of U.S. Trademark Application Serial No. 86264467.

RESPONSE TO REQUEST FOR ADMISSION NO. 30:

Bell's objects to Request 30 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the CHALICE DIVINELY INSPIRED mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 28 above). When compared in their entities, the CHALICE DIVINELY INSPIRED mark and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the CHALICE DIVINELY INSPIRED mark is the first word CHALICE, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' BOTTLING INNOVATION SINCE 1985 mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

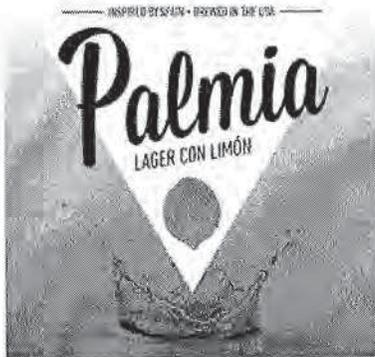
Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the registration of the CHALICE DIVINELY INSPIRED mark. Bell's also objects to this request to the extent it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because, based on a reasonable search, it does not appear that CHALICE DIVINELY INSPIRED is being used as a trademark in the United States. As a result, Bell's is unable to admit or deny the remainder of this request.

REQUEST FOR ADMISSION NO. 31:

Opposer has not objected to use or registration of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON mark, registered as U.S. Trademark Registration No. 4,635,412.

RESPONSE TO REQUEST FOR ADMISSION NO. 31:

Bell's objects to Request 31 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark is the distinctive term PALMIA, which is not contained in Bell's' mark. Subject to the foregoing objections, Bell's admits that it has not objected to the use or registration of the INSPIRED BY SPAIN BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark.

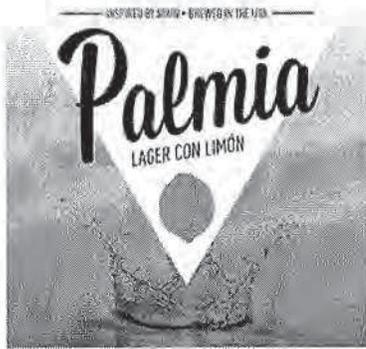
REQUEST FOR ADMISSION NO. 32:

Opposer has no plans to object to use or registration of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON mark, registered as U.S. Trademark Registration No. 4,635,412.

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

Bell's objects to Request 32 on the ground that it calls for information that is irrelevant to

any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 31 above). When compared in their entities, the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON& Design mark is the distinctive term PALMIA, which is not contained in Bell's' mark. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

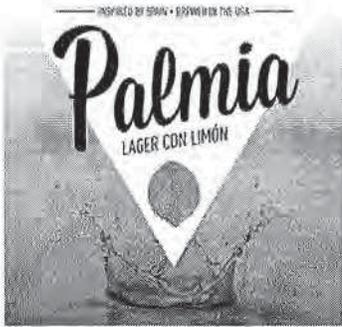
Subject to the foregoing objections, Bell's admits that it has no plans to object to the use or registration of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark.

REQUEST FOR ADMISSION NO. 33:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use or registration of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON mark, registered as U.S. Trademark Registration No. 4,635,412.

RESPONSE TO REQUEST FOR ADMISSION NO. 33:

Bell's objects to Request 33 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 31 above). When compared in their entities, the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark, as shown here:



, and Bell's' INSPIRED BREWING mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is INSPIRED and the dominant portion of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark is the distinctive term PALMIA, which is not contained in Bell's' mark. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use or registration of the INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON & Design mark.

REQUEST FOR ADMISSION NO. 34:

Opposer has not objected to use of the CLARK BREWING INNOVATIONS mark by Clark Brewing Innovations, such as is displayed at www.clarkbrewing.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 34:

Bell's objects to Request 34 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. When compared in their entities, the CLARK BREWING INNOVATIONS mark and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the CLARK BREWING INNOVATIONS mark is the distinctive name CLARK, which is not contained in Bell's' mark. The CLARK BREWING INNOVATIONS mark is also not used on beer, but home brewing equipment. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Subject to the foregoing objections, Bell's admits that it has not objected to the use of the CLARK BREWING INNOVATIONS mark.

REQUEST FOR ADMISSION NO. 35:

Opposer has no plans to object to use of the CLARK BREWING INNOVATIONS mark by Clark Brewing Innovations, such as is displayed at www.clarkbrewing.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 35:

Bell's objects to Request 35 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the CLARK BREWING INNOVATIONS mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 34 above). When compared in their entities, the CLARK

BREWING INNOVATIONS mark and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the CLARK BREWING INNOVATIONS mark is the distinctive name CLARK, which is not contained in Bell's' mark. The CLARK BREWING INNOVATIONS mark is also not used on beer, but home brewing equipment. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the use of the CLARK BREWING INNOVATIONS mark.

REQUEST FOR ADMISSION NO. 36:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the CLARK BREWING INNOVATIONS mark by Clark Brewing Innovations, such as is displayed at www.clarkbrewing.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 36:

Bell's objects to Request 36 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the CLARK BREWING INNOVATIONS mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 34 above). When compared in their entities, the CLARK BREWING INNOVATIONS mark and Bell's' BOTTLING INNOVATION SINCE 1985 mark are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION

and the dominant portion of the CLARK BREWING INNOVATIONS mark is the distinctive name CLARK, which is not contained in Bell's' mark. The CLARK BREWING INNOVATIONS mark is also not used on beer, but home brewing equipment. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use or registration of the CLARK BREWING INNOVATIONS mark.

REQUEST FOR ADMISSION NO. 37:

Opposer has not objected to use of the BREWING INNOVATION mark by Blichmann Engineering, such as is displayed at www.blichmannengineering.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 37:

Bell's objects to Request 37 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because Bell's believes that the phrase "brewing innovation" is used only as a slogan on a website selling brewing and wine making equipment to wholesalers, and not beer, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the Blichmann Engineering website on an ongoing basis. Also, "brewing innovation" does not appear to be on any products or package inserts. As a result and because Bell's is not aware of any uses of the term "brewing innovation" by Blichmann Engineering as a trademark for beer as of April 24, 2015, Bell's is

unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 38:

Opposer has no plans to object to use of the BREWING INNOVATION mark by Blichmann Engineering, such as is displayed at www.blichmannengineering.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 38:

Bell's objects to Request 38 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because Bell's believes that the phrase "brewing innovation" is used only as a slogan on a website selling brewing and wine making equipment to wholesalers, and not beer, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the Blichmann Engineering website on an ongoing basis. Also, "brewing innovation" does not appear to be on any products or package inserts. As a result and because Bell's is not aware of any uses of the term "brewing innovation" by Blichmann Engineering as a trademark for beer as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 39:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the BREWING INNOVATION mark by Blichmann Engineering, such as is displayed at www.blichmannengineering.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 39:

Bell's objects to Request 39 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because Bell's believes that

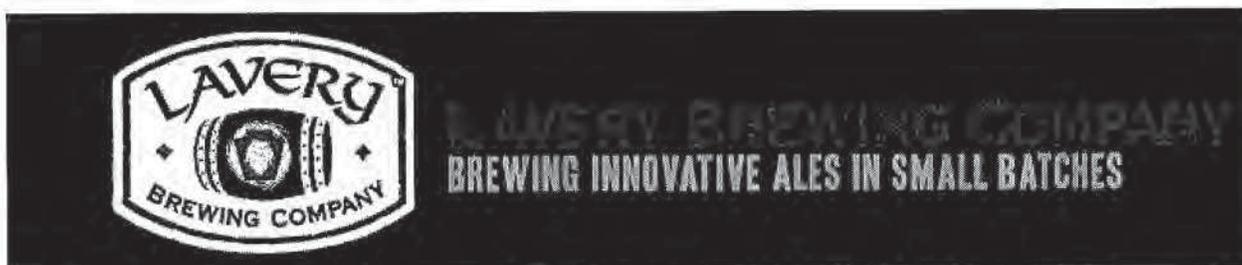
the phrase “brewing innovation” is used only as a slogan on a website selling brewing and wine making equipment to wholesalers, and not beer, as of April 24, 2015. In addition, Bell’s objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell’s to check the Blichmann Engineering website on an ongoing basis. Also, “brewing innovation” does not appear to be on any products or package inserts. As a result and because Bell’s is not aware of any uses of the term “brewing innovation” by Blichmann Engineering as a trademark for beer as of April 24, 2015, Bell’s is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 40:

Opposer has not objected to use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark by Lavery Brewing Company, such as is displayed at www.laverybrewing.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 40:

Bell’s objects to Request 40 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Based on a reasonable search of information available to Bell’s as of April 24, 2015, such as www.laverybrewing.com, the BREWING INNOVATIVE ALES IN SMALL BATCHES tagline does not appear to be used separate and apart from the LAVERY BREWING COMPANY mark. For example, the BREWING INNOVATIVE ALES IN SMALL BATCHES tagline is used on www.laverybrewing.com in the following manner:



As a result, the proper comparison is between LAVERY BREWING COMPANY BREWING INNOVATIVE ALES IN SMALL BATCHES and Bell’s’ BOTTLING INNOVATION SINCE

1985 mark. These marks are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the LAVERY BREWING COMPANY BREWING INNOVATIVE ALES IN SMALL BATCHES mark is the distinctive name LAVERY, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression.

Subject to the foregoing objections, Bell's admits that it has not objected to use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark, as used alongside the distinctive LAVERY BREWING mark.

REQUEST FOR ADMISSION NO. 41:

Opposer has no plans to object to use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark by Lavery Brewing Company, such as is displayed at www.laverybrewing.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 41:

Bell's objects to Request 41 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence because Bell's' plans or lack thereof with regards to the BREWING INNOVATIVE ALES IN SMALL BATCHES mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 40 above). Based on a reasonable search of information available to Bell's as of April 24, 2015, such as www.laverybrewing.com, the BREWING INNOVATIVE ALES IN SMALL BATCHES tagline does not appear to be used separate and apart from the LAVERY BREWING COMPANY mark. For example, the BREWING INNOVATIVE ALES IN SMALL BATCHES tagline is used on www.laverybrewing.com in the following manner:



As a result, the proper comparison is between LAVERY BREWING COMPANY BREWING INNOVATIVE ALES IN SMALL BATCHES and Bell's' BOTTLING INNOVATION SINCE 1985 mark. These marks are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the LAVERY BREWING COMPANY BREWING INNOVATIVE ALES IN SMALL BATCHES mark is the distinctive name LAVERY, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark, as used alongside the distinctive LAVERY BREWING mark.

REQUEST FOR ADMISSION NO. 42:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark by Lavery Brewing Company, such as is displayed at www.laverybrewing.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 42:

Bell's objects to Request 42 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of

admissible evidence because Bell's' plans or lack thereof with regards to the BREWING INNOVATIVE ALES IN SMALL BATCHES mark are irrelevant. This request is also irrelevant because the marks are not similar (see response to Request 40 above). Based on a reasonable search of information available to Bell's as of April 24, 2015, such as www.laverybrewing.com, the BREWING INNOVATIVE ALES IN SMALL BATCHES tagline does not appear to be used separate and apart from the LAVERY BREWING COMPANY mark. For example, the BREWING INNOVATIVE ALES IN SMALL BATCHES tagline is used on www.laverybrewing.com in the following manner:



As a result, the proper comparison is between LAVERY BREWING COMPANY BREWING INNOVATIVE ALES IN SMALL BATCHES and Bell's' BOTTLING INNOVATION SINCE 1985 mark. These marks are different in sight, sound and meaning and create different commercial impressions. In addition, the marks are not similar because the dominant portion of Bell's' mark is BOTTLING INNOVATION and the dominant portion of the LAVERY BREWING COMPANY BREWING INNOVATIVE ALES IN SMALL BATCHES mark is the distinctive name LAVERY, which is not contained in Bell's' mark. Additionally, this third-party mark is not similar to Bell's' INSPIRED BREWING mark because it is different in overall sight, sound and meaning and creates a different commercial impression. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests

for Admissions, it had no plans to object to the use of the BREWING INNOVATIVE ALES IN SMALL BATCHES mark, as used alongside the distinctive LAVERY BREWING mark.

REQUEST FOR ADMISSION NO. 43:

Opposer has not objected to use of the INNOVATION IN TASTE mark by Alaskan Brewing Co., such as is displayed at www.alaskanbeer.com/our-brew/rough-drafts.html.

RESPONSE TO REQUEST FOR ADMISSION NO. 43:

Bell's objects to Request 43 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because Bell's believes that the phrase "innovation in taste" is not being used by Alaskan Brewing Co. as a trademark on www.alaskanbeer.com/our-brew/rough-drafts.html, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the Alaskan Brewing Co. website on an ongoing basis. As a result and because Bell's is not aware of any uses of the term "innovation in taste" by Alaskan Brewing Co. as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 44:

Opposer has no plans to object to use of the INNOVATION IN TASTE mark by Alaskan Brewing Co., such as is displayed at www.alaskanbeer.com/our-brew/rough-drafts.html.

RESPONSE TO REQUEST FOR ADMISSION NO. 44:

Bell's objects to Request 44 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because Bell's believes that

the phrase “innovation in taste” is not being used by Alaskan Brewing Co. as a trademark on www.alaskanbeer.com/our-brew/rough-drafts.html, as of April 24, 2015. In addition, Bell’s objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell’s to check the Alaskan Brewing Co. website on an ongoing basis. As a result and because Bell’s is not aware of any uses of the term “innovation in taste” by Alaskan Brewing Co. as a trademark, as of April 24, 2015, Bell’s is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 45:

Prior to receipt of Applicant’s Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION IN TASTE mark by Alaskan Brewing Co., such as is displayed at www.alaskanbeer.com/our-brew/rough-drafts.html.

RESPONSE TO REQUEST FOR ADMISSION NO. 45:

Bell’s objects to Request 45 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell’s also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because Bell’s believes that the phrase “innovation in taste” is not being used by Alaskan Brewing Co. as a trademark on www.alaskanbeer.com/our-brew/rough-drafts.html, as of April 24, 2015. In addition, Bell’s objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell’s to check the Alaskan Brewing Co. website on an ongoing basis. As a result and because Bell’s is not aware of any uses of the term “innovation in taste” by Alaskan Brewing Co. as a trademark, as of April 24, 2015, Bell’s is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 46:

Opposer has not objected to use of the INNOVATION BREW WORKS mark by Innovation Brew Works, such as is displayed at www.ibrewworks.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 46:

Bell's objects to Request 46 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's understands that as of April 24, 2015, Innovation Brew Works is a café and brewery on the California State Polytechnic University, Pomona campus, and serves as an educational facility for students. Its products currently appear to be available only at its single facility on campus.

Subject to the foregoing objections, Bell's admits that it has not objected to the use of the INNOVATION BREW WORKS mark.

REQUEST FOR ADMISSION NO. 47:

Opposer has no plans to object to use of the INNOVATION BREW WORKS mark by Innovation Brew Works, such as is displayed at www.ibrewworks.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 47:

Bell's objects to Request 47 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's understands that as of April 24, 2015, Innovation Brew Works is a café and brewery on the California State Polytechnic University, Pomona campus, and serves as an educational facility for students. Its products currently appear to be available only at its single facility on campus. In addition, Bell's objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that it has no plans to object to the use of the INNOVATION BREW WORKS mark.

REQUEST FOR ADMISSION NO. 48:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION BREW WORKS mark by Innovation Brew Works, such as is displayed at www.ibrewworks.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 48:

Bell's objects to Request 48 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's understands that as of April 24, 2015, Innovation Brew Works is a café and brewery on the California State Polytechnic University, Pomona campus, and serves as an educational facility for students. Its products currently appear to be available only at its single facility on campus. Bell's also objects to this request to the extent that it calls for information that is subject to attorney-client privilege or work product immunity.

Subject to the foregoing objections, Bell's admits that prior to its receipt of these Requests for Admissions, it had no plans to object to the use of the INNOVATION BREW WORKS mark.

REQUEST FOR ADMISSION NO. 49:

Opposer has not objected to use of the INSPIRATION THROUGH FERMENTATION mark by HopCat, such as is displayed at hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/lIcu5j>

RESPONSE TO REQUEST FOR ADMISSION NO. 49:

Bell's objects to Request 49 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because the phrase "innovation through fermentation" is not being used by HopCat as a trademark on hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/lIcu5j>, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be

changed and/or updated at any time and it is unduly burdensome for Bell's to check these websites on an ongoing basis. As a result and because Bell's is not aware of any uses of the term "innovation through fermentation" by HopCat as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 50:

Opposer has no plans to object to use of the INSPIRATION THROUGH FERMENTATION mark by HopCat, such as is displayed at hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/lIcu5j>.

RESPONSE TO REQUEST FOR ADMISSION NO. 50:

Bell's objects to Request 50 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because the phrase "innovation through fermentation" is not being used by HopCat as a trademark on hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/lIcu5j>, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check these websites on an ongoing basis. As a result and because Bell's is not aware of any uses of the term "innovation through fermentation" by HopCat as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 51:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INSPIRATION THROUGH FERMENTATION mark by HopCat, such as is displayed at hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/lIcu5j>.

RESPONSE TO REQUEST FOR ADMISSION NO. 51:

Bell's objects to Request 51 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because the phrase "innovation through fermentation" is not being used by HopCat as a trademark on hopcat.tumblr.com, twitter.com/hopcat, and <http://goo.gl/llcu5j>, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check these websites on an ongoing basis. As a result and because Bell's is not aware of any uses of the term "innovation through fermentation" by HopCat as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 52:

Opposer has not objected to use of the INNOVATION mark by MillerCoors, such as is displayed at www.millercoors.com/Our-Beers/Innovation.aspx.

RESPONSE TO REQUEST FOR ADMISSION NO. 52:

Bell's objects to Request 52 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because the term "innovation" is not being used by MillerCoors as a trademark on www.millercoors.com/Our-Beers/Innovation.aspx, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the MillerCoors website on an ongoing basis. As a result, and because Bell's is not aware of any uses of the term "innovation" by MillerCoors as a

trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 53:

Opposer has no plans to object to use of the INNOVATION mark by MillerCoors, such as is displayed at www.millercoors.com/Our-Beers/Innovation.aspx.

RESPONSE TO REQUEST FOR ADMISSION NO. 53:

Bell's objects to Request 53 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because the term "innovation" is not being used by MillerCoors as a trademark on www.millercoors.com/Our-Beers/Innovation.aspx, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the MillerCoors website on an ongoing basis. As a result, and because Bell's is not aware of any uses of the term "innovation" by MillerCoors as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 54:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION mark by MillerCoors, such as is displayed at www.millercoors.com/Our-Beers/Innovation.aspx.

RESPONSE TO REQUEST FOR ADMISSION NO. 54:

Bell's objects to Request 54 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because the term "innovation" is not being used by MillerCoors as a trademark on www.millercoors.com/Our-Beers/Innovation.aspx, as of April 24, 2015. In addition, Bell's objects to this request on the

ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the MillerCoors website on an ongoing basis. As a result, and because Bell's is not aware of any uses of the term "innovation" by MillerCoors as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 55:

Opposer has not objected to use of the INNOVATION mark by InBev, such as is displayed at www.ab-inbev.com/innovation.html.

RESPONSE TO REQUEST FOR ADMISSION NO. 55:

Bell's objects to Request 55 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because the term "innovation" is not being used by InBev as a trademark on www.ab-inbev.com/innovation.html, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the InBev website on an ongoing basis. As a result, and because Bell's is not aware of any uses of the term "innovation" by InBev as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 56:

Opposer has no plans to object to use of the INNOVATION mark by InBev, such as is displayed at www.ab-inbev.com/innovation.html.

RESPONSE TO REQUEST FOR ADMISSION NO. 56:

Bell's objects to Request 56 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite,

incomprehensible and contains assumptions of fact that are not accurate because the term “innovation” is not being used by InBev as a trademark on www.ab-inbev.com/innovation.html, as of April 24, 2015. In addition, Bell’s objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell’s to check the InBev website on an ongoing basis. As a result, and because Bell’s is not aware of any uses of the term “innovation” by InBev as a trademark, as of April 24, 2015, Bell’s is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 57:

Prior to receipt of Applicant’s Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION mark by InBev, such as is displayed at www.ab-inbev.com/innovation.html.

RESPONSE TO REQUEST FOR ADMISSION NO. 57:

Bell’s objects to Request 57 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell’s also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because the term “innovation” is not being used by InBev as a trademark on www.ab-inbev.com/innovation.html, as of April 24, 2015. In addition, Bell’s objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell’s to check the InBev website on an ongoing basis. As a result, and because Bell’s is not aware of any uses of the term “innovation” by InBev as a trademark, as of April 24, 2015, Bell’s is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 58:

Opposer has not objected to use of the INNOVATION STARTS AND ENDS WITH OUR BEER DRINKERS. mark, the INNOVATION IN MOTION mark, and the DEDICATION TO INNOVATION mark by MolsonCoors, such as is displayed at www.molsoncoors.com/en/innovation.aspx.

RESPONSE TO REQUEST FOR ADMISSION NO. 58:

Bell's objects to Request 58 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because none of the above identified "marks" are being used by MolsonCoors as a trademark on www.molsoncoors.com/en/innovation.aspx, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the MolsonCoors website on an ongoing basis. As a result, and because Bell's is not aware of any uses of these "marks" by MolsonCoors as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 59:

Opposer has no plans to object to use of the INNOVATION STARTS AND ENDS WITH OUR BEER DRINKERS. mark, the INNOVATION IN MOTION mark, and the DEDICATION TO INNOVATION mark by MolsonCoors, such as is displayed at www.molsoncoors.com/en/innovation.aspx.

RESPONSE TO REQUEST FOR ADMISSION NO. 59:

Bell's objects to Request 59 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because none of the above identified "marks" are being used by MolsonCoors as a trademark on www.molsoncoors.com/en/innovation.aspx, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the MolsonCoors website on an ongoing basis. As a result, and because Bell's is not aware of any uses of these "marks" by

MolsonCoors as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 60:

Prior to receipt of Applicant's Second Set of Requests for Admissions, Opposer has had no plans to object to use of the INNOVATION STARTS AND ENDS WITH OUR BEER DRINKERS. mark, the INNOVATION IN MOTION mark, and the DEDICATION TO INNOVATION mark by MolsonCoors, such as is displayed at www.molsoncoors.com/en/innovation.aspx.

RESPONSE TO REQUEST FOR ADMISSION NO. 60:

Bell's objects to Request 60 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the ground that it is vague, indefinite, incomprehensible and contains assumptions of fact that are not accurate because none of the above identified "marks" are being used by MolsonCoors as a trademark on www.molsoncoors.com/en/innovation.aspx, as of April 24, 2015. In addition, Bell's objects to this request on the ground that it is unduly burdensome because webpages can be changed and/or updated at any time and it is unduly burdensome for Bell's to check the MolsonCoors website on an ongoing basis. As a result, and because Bell's is not aware of any uses of these "marks" by MolsonCoors as a trademark, as of April 24, 2015, Bell's is unable to admit or deny this request.

REQUEST FOR ADMISSION NO. 61:

Opposer believes that to successfully protect one's rights to a trademark, one must object to use of similar trademarks by third parties.

RESPONSE TO REQUEST FOR ADMISSION NO. 61:

Bell's objects to Request 61 on the ground that this request is vague and ambiguous. The term "similar trademarks" has many different meanings and Opposer believes that the decision to object to the use of any third-party mark should take into consideration many market factors which determine whether the marks are likely to cause confusion. These factors differ from circuit to circuit. For example, in the Second Circuit, the following factors should be considered: (1)

and commercial impression; (2) the similarity or dissimilarity and nature of the goods or services as described in an application or registration or in connection with which a prior mark is in use; (3) the similarity or dissimilarity of established, likely-to-continue trade channels; (4) the conditions under which and buyers to whom sales are made, *i.e.* "impulse" vs. careful, sophisticated purchasing; (5) the fame of the prior mark (sales, advertising, length of use); (6) the number and nature of similar marks in use on similar goods; (7) the nature and extent of any actual confusion; (8) the length of time during and conditions under which there has been concurrent use without evidence of actual confusion; (9) the variety of goods on which a mark is or is not used (house mark, "family" mark, product mark); (10) the market interface between applicant and the owner of a prior mark; (11) the extent to which applicant has a right to exclude others from use of its mark on its goods; (12) the extent of potential confusion, *i.e.*, whether *de minimis* or substantial; and (13) any other established fact probative of the effect of use.

Bell's also objects to this request on the ground that this request calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objections, Bell's denies that one must object to the registration of similar trademarks by third parties to successfully protect one's rights to a trademark because objections are warranted only in appropriate circumstances.

REQUEST FOR ADMISSION NO. 63:

Opposer has been brewing beer since 1985.

RESPONSE TO REQUEST FOR ADMISSION NO. 63:

Bell's objects to Request 63 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. There is no dispute that Opposer has been brewing beer since long prior to Applicant's filing of its application to register INNOVATION BREWING or any alleged first use

date of that term. Subject to the foregoing objections, Bell's admits that it has been brewing beer since 1985.

REQUEST FOR ADMISSION NO. 64:

Opposer has been bottling beer since 1985.

RESPONSE TO REQUEST FOR ADMISSION NO. 64:

Bell's objects to Request 64 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objections, Bell's admits that it has been bottling beer since 1985.

REQUEST FOR ADMISSION NO. 65:

Opposer has been selling bottled beer since 1985.

RESPONSE TO REQUEST FOR ADMISSION NO. 65:

Bell's objects to Request 65 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objections, Bell's admits that it has been selling bottled beer since 1985.

REQUEST FOR ADMISSION NO. 66:

Opposer has been selling beer since 1985.

RESPONSE TO REQUEST FOR ADMISSION NO. 66:

Bell's objects to Request 66 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objections, Bell's admits that it has been selling beer since 1985.

REQUEST FOR ADMISSION NO. 67:

The word “inspired” has the same meaning as the word “innovation.”

RESPONSE TO REQUEST FOR ADMISSION NO. 67:

Bell’s objects to Request 67 on the ground that it is vague and indefinite. Subject to the foregoing objections, Bell’s denies that the word “inspired” has the identical meaning as the word “innovation,” but the terms “inspired” and “innovation” have similar meanings.

REQUEST FOR ADMISSION NO. 68:

The word “inspired” has a different meaning than the word “innovation.”

RESPONSE TO REQUEST FOR ADMISSION NO. 68:

Bell’s objects to Request 68 on the ground that it is vague and indefinite. Subject to the foregoing objections, Bell’s denies that the word “inspired” has an entirely different meaning than the word “innovation,” as the terms “inspired” and “innovation” have similar meanings.

REQUEST FOR ADMISSION NO. 69:

The word “inspired” sounds the same as the word “innovation.”

RESPONSE TO REQUEST FOR ADMISSION NO. 69:

Bell’s objects to Request 69 on the ground that it is vague and indefinite. Subject to the foregoing objections, Bell’s denies that the word “inspired” sounds exactly like the word “innovation,” but the terms “inspired” and “innovation” are similar in sound.

REQUEST FOR ADMISSION NO. 70:

The word “inspired” sounds different than the word “innovation.”

RESPONSE TO REQUEST FOR ADMISSION NO. 70:

Bell’s objects to Request 70 on the ground that it is vague and indefinite. Subject to the foregoing objections, Bell’s denies that the word “inspired” has an entirely different sound than the word “innovation,” as the terms “inspired” and “innovation” are similar in sound.

RESPONSE TO REQUEST FOR ADMISSION NO. 91:

Bell's objects to Request 91 on the ground that it calls for information that is irrelevant to any claim or defense in this opposition and is not reasonably calculated to lead to the discovery of admissible evidence. Bell's also objects to this request on the grounds it is vague, indefinite, incomprehensible and unduly burdensome. There are too many unknown variables, including, but not limited to the identity of the slogan, the strength of the slogan, the public recognition of the slogan, the identity of the product and whether the slogan serves as secondary source identifier for the product. As a result, Bell's is unable to admit or deny this request.

AS TO OBJECTIONS:

DORSEY & WHITNEY LLP



By: _____

Sarah M. Robertson
Susan Prohoff
Fara S. Sunderji
51 West 52nd Street
New York, New York 10019
Tel.: 212-415-9200
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THE FIRM OF HUESCHEN AND SAGE

G. Patrick Sage
Joanna T. French
Seventh Floor, Kalamazoo Building
107 West Michigan Avenue
Kalamazoo, Michigan 49007
Tel.: 269-382-0030

*Attorneys for Opposer,
Bell's Brewery, Inc.*

Dated: April 24, 2015

VERIFICATION

I, Laura Bell, declare under penalty of perjury, under the laws of the United States that:

I am the Vice President of Bell's Brewery, Inc. I have read the foregoing Opposer's Responses to Applicant's Second Set of Requests for Admissions and know the contents thereof and believe that the same are true based on my personal knowledge, information supplied to me and the books, records and documents maintained by Bell's Brewery, Inc.


LAURA BELL

Exhibit 6

REDACTED – FILED UNDER SEAL

Exhibit 7

REDACTED – FILED UNDER SEAL

Exhibit 8

REDACTED – FILED UNDER SEAL

Exhibit 9

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Mark: HEINEKEN INSPIRE

HEINEKEN INSPIRE

US Serial Number: 77951580

Application Filing Date: Mar. 05, 2010

US Registration Number: 3918086

Registration Date: Feb. 08, 2011

Register: Principal

Mark Type: Trademark, Service Mark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Feb. 08, 2011

Publication Date: Jul. 27, 2010

Notice of Allowance Date: Sep. 21, 2010

Mark Information

Mark Literal Elements: HEINEKEN INSPIRE

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Related Properties Information

Claimed Ownership of US Registrations: 0956608, 1846907, 2781138 and others

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis (..) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Beer

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(a)

First Use: Oct. 2010

Use in Commerce: Oct. 2010

For: Entertainment services in the nature of live concerts featuring music

International Class(es): 041 - Primary Class

U.S Class(es): 100, 101, 107

Class Status: ACTIVE

Basis: 1(a)

First Use: May 21, 2010

Use in Commerce: May 21, 2010

Basis Information (Case Level)

Filed Use: No

Currently Use: Yes

Amended Use: No

Filed ITU: Yes

Currently ITU: No

Amended ITU: No

Filed 44D: No
Filed 44E: No
Filed 66A: No
Filed No Basis: No

Currently 44D: No
Currently 44E: No
Currently 66A: No
Currently No Basis: No

Amended 44D: No
Amended 44E: No

Current Owner(s) Information

Owner Name: Heineken Brouwerijen B.V.
Owner Address: NL-1017 ZD
Tweede Weteringplantsoen 21
Amsterdam
NETHERLANDS
Legal Entity Type: besloten vennootschap (b.v.)
State or Country Where Organized: NETHERLANDS

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Jonathan Hudis
Attorney Primary Email Address: tmddocket@oblon.com
Docket Number: 356198US69
Attorney Email Authorized: No

Correspondent

Correspondent Name/Address: JONATHAN HUDIS
OBLON SPIVAK MCCLELLAND MAIER & NEUSTADT
1940 DUKE ST
ALEXANDRIA, VIRGINIA 22314
UNITED STATES
Phone: 703-413-3000
Fax: 703-413-2220
Correspondent e-mail: tmddocket@oblon.com
Correspondent e-mail Authorized: No

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Feb. 08, 2011	REGISTERED-PRINCIPAL REGISTER	
Jan. 05, 2011	NOTICE OF ACCEPTANCE OF STATEMENT OF USE E-MAILED	
Jan. 04, 2011	LAW OFFICE REGISTRATION REVIEW COMPLETED	76568
Jan. 03, 2011	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
Dec. 15, 2010	STATEMENT OF USE PROCESSING COMPLETE	76873
Nov. 24, 2010	USE AMENDMENT FILED	76873
Dec. 15, 2010	CASE ASSIGNED TO INTENT TO USE PARALEGAL	76873
Nov. 24, 2010	TEAS STATEMENT OF USE RECEIVED	
Sep. 21, 2010	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
Jul. 27, 2010	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Jul. 27, 2010	PUBLISHED FOR OPPOSITION	
Jun. 24, 2010	LAW OFFICE PUBLICATION REVIEW COMPLETED	76568
Jun. 24, 2010	ASSIGNED TO LIE	76568
Jun. 09, 2010	APPROVED FOR PUB - PRINCIPAL REGISTER	
Jun. 08, 2010	ASSIGNED TO EXAMINER	76855
Mar. 19, 2010	APPLICANT AMENDMENT PRIOR TO EXAMINATION - ENTERED	76984
Mar. 19, 2010	ASSIGNED TO LIE	76984
Mar. 09, 2010	TEAS VOLUNTARY AMENDMENT RECEIVED	
Mar. 10, 2010	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Mar. 09, 2010	NEW APPLICATION ENTERED IN TRAM	

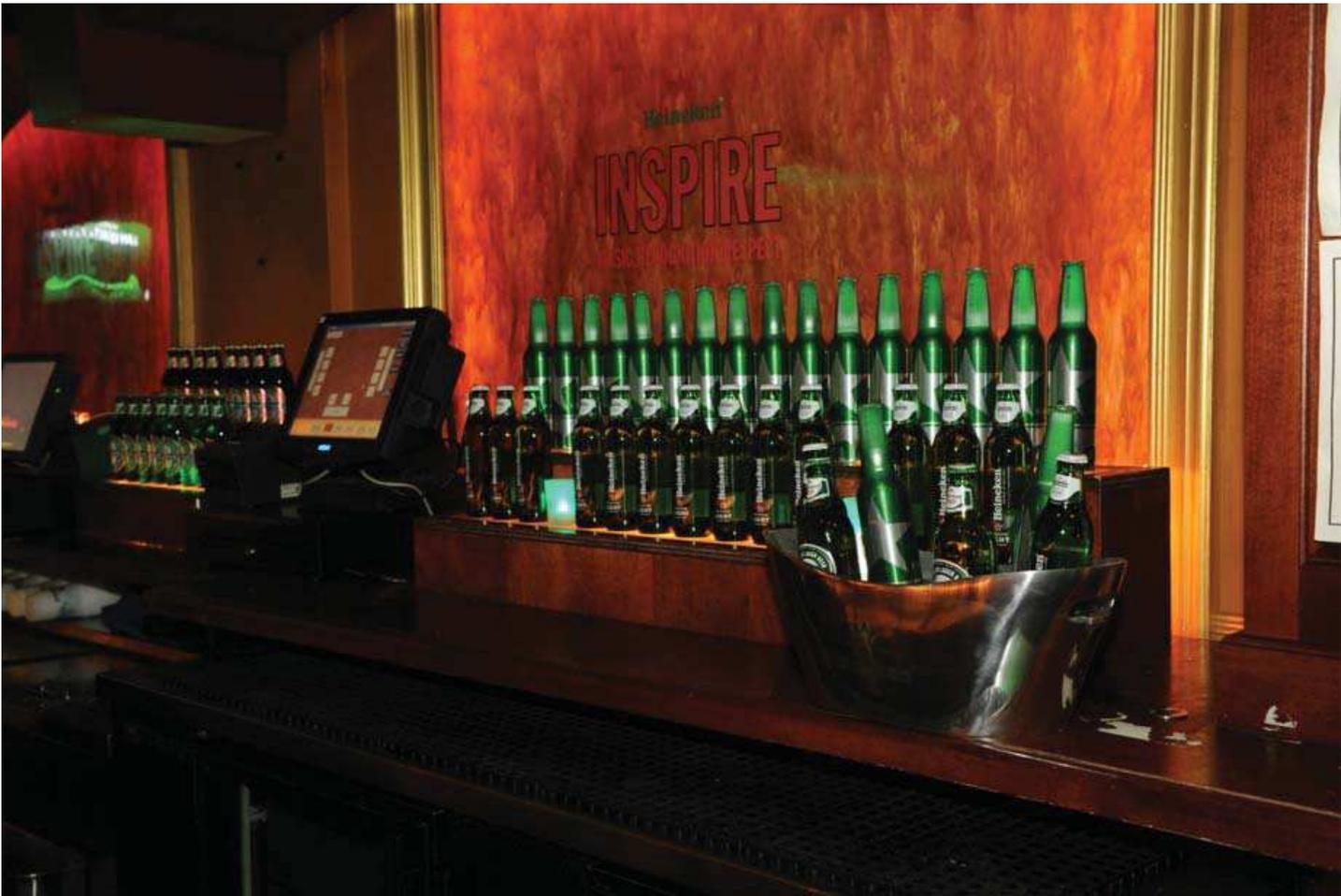
TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Jan. 04, 2011





Heineken
INSPIRE
TWO DAYS OF MUSIC, ART
AND CREATIVE ENDEAVORS.
FRIDAY MAY 21
SATURDAY MAY 22
IN THE DESIGN DISTRICT
COLD WAR KIDS
THE HOLD STEADY
TITO EL BAMBINO
WALE
CHAD HUGO
DJ IRIE
HEINEKEN MEZCLASONIC DJS

Exhibit 10

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Mark: ROYALLY INSPIRED, COMMONLY ENJOYED

Royally Inspired, Commonly
Enjoyed

US Serial Number: 77772488

Application Filing Date: Jul. 01, 2009

US Registration Number: 3945100

Registration Date: Apr. 12, 2011

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Apr. 12, 2011

Publication Date: Nov. 17, 2009

Notice of Allowance Date: Feb. 09, 2010

Mark Information

Mark Literal Elements: ROYALLY INSPIRED, COMMONLY ENJOYED

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Alcoholic beverages except beers

International Class(es): 033 - Primary Class

U.S Class(es): 047, 049

Class Status: ACTIVE

Basis: 1(a)

First Use: Jan. 12, 2011

Use in Commerce: Jan. 20, 2011

Basis Information (Case Level)

Filed Use: No

Currently Use: Yes

Amended Use: No

Filed ITU: Yes

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: Truth Spirits, LLC

Owner Address: 2202 W. 49th St.
Austin, TEXAS 78756
UNITED STATES

Legal Entity Type: LIMITED LIABILITY COMPANY

State or Country TEXAS
Where Organized:

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Anthony C. Goodall
Attorney Primary Email Address: agoodall@goodalldavison.com
Docket Number: 01436.002
Attorney Email Authorized: No

Correspondent

Correspondent Name/Address: Anthony C. Goodall
GOODALL & DAVISON, P.C.
1250 S. Capital of TX Hwy., Ste. III-601
AUSTIN, TEXAS 78746
UNITED STATES
Phone: 512-327-3400
Fax: 512-306-8903
Correspondent e-mail: agoodall@goodalldavison.com
Correspondent e-mail Authorized: No

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Apr. 12, 2011	REGISTERED-PRINCIPAL REGISTER	
Mar. 08, 2011	NOTICE OF ACCEPTANCE OF STATEMENT OF USE E-MAILED	
Mar. 05, 2011	LAW OFFICE REGISTRATION REVIEW COMPLETED	77976
Mar. 01, 2011	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
Feb. 08, 2011	STATEMENT OF USE PROCESSING COMPLETE	66154
Feb. 03, 2011	USE AMENDMENT FILED	66154
Feb. 03, 2011	TEAS STATEMENT OF USE RECEIVED	
Jan. 21, 2011	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
Jan. 20, 2011	EXTENSION 2 GRANTED	66154
Jan. 19, 2011	EXTENSION 2 FILED	66154
Jan. 19, 2011	TEAS EXTENSION RECEIVED	
Jan. 20, 2011	APPLICANT/CORRESPONDENCE CHANGES (NON-RESPONSIVE) ENTERED	66154
Jan. 19, 2011	CASE ASSIGNED TO INTENT TO USE PARALEGAL	66154
Jan. 19, 2011	TEAS WITHDRAWAL OF ATTORNEY RECEIVED-FIRM RETAINS	
Aug. 05, 2010	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
Aug. 03, 2010	EXTENSION 1 GRANTED	98765
Aug. 03, 2010	EXTENSION 1 FILED	98765
Aug. 03, 2010	TEAS EXTENSION RECEIVED	
Feb. 09, 2010	NOA MAILED - SOU REQUIRED FROM APPLICANT	
Nov. 17, 2009	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Nov. 17, 2009	PUBLISHED FOR OPPOSITION	
Oct. 14, 2009	LAW OFFICE PUBLICATION REVIEW COMPLETED	77976
Oct. 14, 2009	ASSIGNED TO LIE	77976
Sep. 28, 2009	APPROVED FOR PUB - PRINCIPAL REGISTER	
Sep. 28, 2009	ASSIGNED TO EXAMINER	81089
Jul. 06, 2009	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Jul. 04, 2009	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Mar. 05, 2011

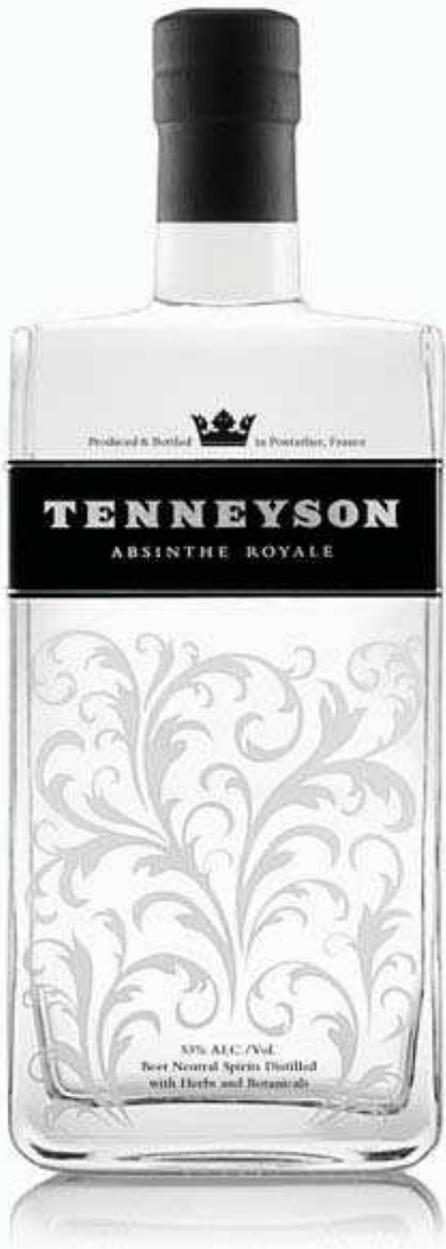


Exhibit 11

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Mark: THE KIN GROUP - INSPIRE SPIRITS

The KiN Group - Inspire Spirit

US Serial Number: 79091204

Application Filing Date: Nov. 24, 2010

US Registration Number: 4017912

Registration Date: Aug. 30, 2011

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Aug. 30, 2011

Publication Date: Jun. 14, 2011

Mark Information

Mark Literal Elements: THE KIN GROUP - INSPIRE SPIRITS

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Disclaimer: "GROUP" AND "SPIRITS"

Related Properties Information

International Registration Number: 1061540

International Registration Date: Nov. 24, 2010

Claimed Ownership of US Registrations: 3818666

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((..)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Beers; table, mineral and aerated waters; lemonade and syrups for lemonade; fruit drinks and fruit juices, fruit nectars; fruit flavored syrups for making beverages; fruit juice concentrates for making beverages; non-alcoholic aperitifs; isotonic beverages; non-alcoholic beverages made with honey; non-alcoholic cocktails; non-alcoholic fruit extracts used in the preparation of beverages; beverages made with vegetable juices; non-alcoholic kvass; malt worts; preparations in the nature of essences for making liqueurs

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 66(a)

For: Alcoholic beverages except beers; hard cider; digestifs being liqueurs and spirits; wines; spirits; alcoholic extracts and essences

International Class(es): 033 - Primary Class

U.S Class(es): 047, 049

Class Status: ACTIVE

Basis: 66(a)

Basis Information (Case Level)

Filed Use: No

Currently Use: No

Amended Use: No

Filed ITU: No	Currently ITU: No	Amended ITU: No
Filed 44D: No	Currently 44D: No	Amended 44D: No
Filed 44E: No	Currently 44E: No	Amended 44E: No
Filed 66A: Yes	Currently 66A: Yes	
Filed No Basis: No	Currently No Basis: No	

Current Owner(s) Information

Owner Name: Otkrytoie aktsionernoie obchtchestvo "Moskovski vinno-koniatchny zavod "KiN"
Owner Address: Leningradskoie chosse, d. 67
 RU-125445 Moscou
 RUSSIAN FEDERATION
Legal Entity Type: UNKNOWN
State or Country Where Organized: No Place Where Organized Found

Attorney/Correspondence Information

Attorney of Record

Docket Number: GER1912TUS

Correspondent

Correspondent Name/Address: GEORGE A. PELLETIER, JR.
 CANTOR COLBURN LLP
 20 CHURCH ST
 FL 22
 HARTFORD, CONNECTICUT 06103-1221
 UNITED STATES

Correspondent e-mail: TM-CT@cantorcolburn.com

Correspondent e-mail Authorized: No

Domestic Representative

Phone: 860-286-2929

Fax: 860-286-0115

Domestic Representative e-mail: TM-CT@cantorcolburn.com

Domestic Representative e-mail Authorized: Yes

Prosecution History

Date	Description	Proceeding Number
Mar. 03, 2016	CHANGE OF OWNER RECEIVED FROM IB	
Apr. 16, 2013	FINAL DECISION TRANSACTION PROCESSED BY IB	
Apr. 11, 2012	FINAL DISPOSITION NOTICE SENT TO IB	
Apr. 11, 2012	FINAL DISPOSITION PROCESSED	68359
Nov. 30, 2011	FINAL DISPOSITION NOTICE CREATED, TO BE SENT TO IB	
Aug. 30, 2011	REGISTERED-PRINCIPAL REGISTER	
Aug. 27, 2011	NOTIFICATION PROCESSED BY IB	
Jun. 14, 2011	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Jun. 14, 2011	PUBLISHED FOR OPPOSITION	
May 25, 2011	NOTIFICATION OF POSSIBLE OPPOSITION SENT TO IB	
May 25, 2011	NOTICE OF START OF OPPOSITION PERIOD CREATED, TO BE SENT TO IB	
May 11, 2011	LAW OFFICE PUBLICATION REVIEW COMPLETED	69712
May 10, 2011	ASSIGNED TO LIE	69712
Apr. 25, 2011	APPROVED FOR PUB - PRINCIPAL REGISTER	
Apr. 19, 2011	TEAS/EMAIL CORRESPONDENCE ENTERED	88889
Apr. 19, 2011	CORRESPONDENCE RECEIVED IN LAW OFFICE	88889
Apr. 19, 2011	TEAS RESPONSE TO OFFICE ACTION RECEIVED	
Apr. 13, 2011	ATTORNEY REVOKED AND/OR APPOINTED	
Apr. 13, 2011	TEAS REVOKE/APPOINT ATTORNEY RECEIVED	
Mar. 27, 2011	REFUSAL PROCESSED BY IB	

Mar. 08, 2011	NON-FINAL ACTION MAILED - REFUSAL SENT TO IB	
Mar. 08, 2011	REFUSAL PROCESSED BY MPU	68359
Mar. 08, 2011	NON-FINAL ACTION (IB REFUSAL) PREPARED FOR REVIEW	
Mar. 07, 2011	NON-FINAL ACTION WRITTEN	85331
Mar. 04, 2011	ASSIGNED TO EXAMINER	85331
Jan. 18, 2011	APPLICATION FILING RECEIPT MAILED	
Jan. 14, 2011	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Jan. 13, 2011	SN ASSIGNED FOR SECT 66A APPL FROM IB	

International Registration Information (Section 66a)

International Registration Number: 1061540	International Registration Date: Nov. 24, 2010
Priority Claimed Flag: Yes	Date of Section 67 Priority Claim: Jun. 21, 2010
Intl. Registration Status: REQUEST FOR EXTENSION OF PROTECTION PROCESSED	Date of International Registration Status: Jan. 13, 2011
Notification of Designation Date: Jan. 13, 2011	Date of Automatic Protection: Jul. 13, 2012
International Registration Renewal Date: Nov. 24, 2020	
First Refusal Flag: Yes	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Aug. 30, 2011

Exhibit 12

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Mark: AIR ALCOHOL INSPIRED REFRESHER

AIR ALCOHOL INSPIRED
REFRESHER

US Serial Number: 85497150

Application Filing Date: Dec. 16, 2011

US Registration Number: 4227737

Registration Date: Oct. 16, 2012

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Oct. 16, 2012

Publication Date: May 08, 2012

Notice of Allowance Date: Jul. 03, 2012

Mark Information

Mark Literal Elements: AIR ALCOHOL INSPIRED REFRESHER

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Disclaimer: "ALCOHOL" AND "REFRESHER"

Related Properties Information

International Registration Number: 1113922

International Application(s)/Registration(s) Based on this Property: A0028795/1113922

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((..)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Beer; Brewed malt-based alcoholic beverage in the nature of a beer

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(a)

First Use: Apr. 20, 2012

Use in Commerce: Apr. 20, 2012

Basis Information (Case Level)

Filed Use: No

Currently Use: Yes

Amended Use: No

Filed ITU: Yes

Currently ITU: No

Amended ITU: No

Filed 44D: No
Filed 44E: No
Filed 66A: No
Filed No Basis: No

Currently 44D: No
Currently 44E: No
Currently 66A: No
Currently No Basis: No

Amended 44D: No
Amended 44E: No

Current Owner(s) Information

Owner Name: McKenzie River Corporation
Owner Address: 1045 Sansome Street, #118
San Francisco, CALIFORNIA 94111
UNITED STATES
Legal Entity Type: CORPORATION
State or Country Where Organized: CALIFORNIA

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Thomas H. Zellerbach
Attorney Primary Email Address: ipprosecution@orrick.com
Docket Number: 10114.6056
Attorney Email Authorized: No

Correspondent

Correspondent Name/Address: THOMAS H. ZELLERBACH
ORRICK, HERRINGTON & SUTCLIFFE LLP
2050 MAIN ST STE 1100
IRVINE, CALIFORNIA 92614-8280
UNITED STATES
Phone: 650-614-7400
Fax: 650-614-7401
Correspondent e-mail: ipprosecution@orrick.com
Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Mar. 18, 2014	APPLICANT/CORRESPONDENCE CHANGES (NON-RESPONSIVE) ENTERED	88888
Mar. 18, 2014	TEAS CHANGE OF OWNER ADDRESS RECEIVED	
Mar. 29, 2013	APPLICANT/CORRESPONDENCE CHANGES (NON-RESPONSIVE) ENTERED	88888
Mar. 29, 2013	TEAS CHANGE OF OWNER ADDRESS RECEIVED	
Oct. 16, 2012	REGISTERED-PRINCIPAL REGISTER	
Sep. 13, 2012	NOTICE OF ACCEPTANCE OF STATEMENT OF USE E-MAILED	
Sep. 12, 2012	LAW OFFICE REGISTRATION REVIEW COMPLETED	77976
Sep. 07, 2012	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
Aug. 21, 2012	STATEMENT OF USE PROCESSING COMPLETE	76538
Aug. 04, 2012	USE AMENDMENT FILED	76538
Aug. 21, 2012	CASE ASSIGNED TO INTENT TO USE PARALEGAL	76538
Aug. 04, 2012	TEAS STATEMENT OF USE RECEIVED	
Jul. 03, 2012	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
May 08, 2012	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
May 08, 2012	PUBLISHED FOR OPPOSITION	
Apr. 18, 2012	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Apr. 03, 2012	LAW OFFICE PUBLICATION REVIEW COMPLETED	77976
Mar. 31, 2012	APPROVED FOR PUB - PRINCIPAL REGISTER	
Mar. 30, 2012	EXAMINER'S AMENDMENT ENTERED	77976
Mar. 30, 2012	ASSIGNED TO LIE	77976
Mar. 30, 2012	NOTIFICATION OF EXAMINERS AMENDMENT E-MAILED	6328
Mar. 30, 2012	EXAMINERS AMENDMENT E-MAILED	6328
Mar. 30, 2012	EXAMINERS AMENDMENT -WRITTEN	81111
Mar. 25, 2012	ASSIGNED TO EXAMINER	81111

Dec. 27, 2011 NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM

Dec. 20, 2011 NEW APPLICATION ENTERED IN TRAM

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Sep. 12, 2012

4% alc/vol

95 cal*

Air™

Alcohol Inspired Refresher

Citrus
Contains
Water
+ Alcohol

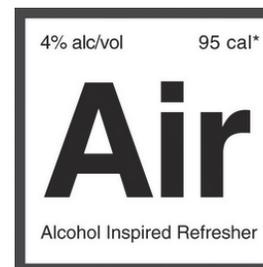
Carbonated

Premium Clear Malt Beverage
with Water and Natural Flavors
12 fl. oz

Exhibit 13

Generated on: This page was generated by TSDR on 2016-09-08 17:56:36 EDT

Mark: 4% ALC/VOL 95 CAL* AIR ALCOHOL INSPIRED REFRESHER



US Serial Number: 85537360

Application Filing Date: Feb. 08, 2012

US Registration Number: 4310370

Registration Date: Mar. 26, 2013

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Mar. 26, 2013

Publication Date: May 08, 2012

Notice of Allowance Date: Jul. 03, 2012

Mark Information

Mark Literal Elements: 4% ALC/VOL 95 CAL* AIR ALCOHOL INSPIRED REFRESHER

Standard Character Claim: No

Mark Drawing Type: 3 - AN ILLUSTRATION DRAWING WHICH INCLUDES WORD(S)/ LETTER(S)/NUMBER(S)

Description of Mark: The mark consists of outlined square box with "4% alc/vol" inside box left corner, "95 cal*" top right corner, word "Air" in center and "Alcohol Inspired Refresher" across bottom of box.

Color(s) Claimed: Color is not claimed as a feature of the mark.

Disclaimer: 4% ALC/VOL," "95 CAL"," "ALCOHOL" AND "REFRESHER"

Design Search Code(s): 20.03.10 - Alcohol bottle labels; Bottles, labels for alcohol bottles; Labels, alcohol bottles
26.11.02 - Plain single line rectangles; Rectangles (single line)

Related Properties Information

International Registration Number: 1142073

International Application(s) /Registration(s) Based on this Property: A0031188/1142073

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((.)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Beer; Brewed malt-based alcoholic beverage in the nature of a beer

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class(es):**Class Status:** ACTIVE**Basis:** 1(a)**First Use:** Apr. 20, 2012**Use in Commerce:** Apr. 20, 2012

Basis Information (Case Level)

Filed Use: No	Currently Use: Yes	Amended Use: No
Filed ITU: Yes	Currently ITU: No	Amended ITU: No
Filed 44D: No	Currently 44D: No	Amended 44D: No
Filed 44E: No	Currently 44E: No	Amended 44E: No
Filed 66A: No	Currently 66A: No	
Filed No Basis: No	Currently No Basis: No	

Current Owner(s) Information

Owner Name: McKenzie River Corporation**Owner Address:** 1045 Sansome Street, #118
San Francisco, CALIFORNIA 94111
UNITED STATES**Legal Entity Type:** CORPORATION**State or Country** CALIFORNIA
Where Organized:

Attorney/Correspondence Information

Attorney of Record**Attorney Name:** Thomas H. Zellerbach**Docket Number:** 10114.6057**Attorney Primary Email Address:** ipprosecution@orrick.com**Attorney Email Authorized:** No**Correspondent****Correspondent Name/Address:** THOMAS H. ZELLERBACH
ORRICK, HERRINGTON & SUTCLIFFE LLP
2050 MAIN ST STE 1100
IRVINE, CALIFORNIA 92614-8280
UNITED STATES**Phone:** 650-614-7400**Fax:** 650-614-7401**Correspondent e-mail:** ipprosecution@orrick.com**Correspondent e-mail Authorized:** Yes**Domestic Representative - Not Found**

Prosecution History

Date	Description	Proceeding Number
Mar. 18, 2014	APPLICANT/CORRESPONDENCE CHANGES (NON-RESPONSIVE) ENTERED	88888
Mar. 18, 2014	TEAS CHANGE OF OWNER ADDRESS RECEIVED	
Mar. 29, 2013	APPLICANT/CORRESPONDENCE CHANGES (NON-RESPONSIVE) ENTERED	88888
Mar. 29, 2013	TEAS CHANGE OF OWNER ADDRESS RECEIVED	
Mar. 26, 2013	REGISTERED-PRINCIPAL REGISTER	
Feb. 22, 2013	NOTICE OF ACCEPTANCE OF STATEMENT OF USE E-MAILED	
Feb. 21, 2013	LAW OFFICE REGISTRATION REVIEW COMPLETED	70138
Feb. 20, 2013	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
Feb. 01, 2013	STATEMENT OF USE PROCESSING COMPLETE	66230
Jan. 02, 2013	USE AMENDMENT FILED	66230
Jan. 24, 2013	CASE ASSIGNED TO INTENT TO USE PARALEGAL	66230
Jan. 02, 2013	TEAS STATEMENT OF USE RECEIVED	
Jul. 03, 2012	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
May 08, 2012	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	

May 08, 2012	PUBLISHED FOR OPPOSITION	
Apr. 18, 2012	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Mar. 31, 2012	LAW OFFICE PUBLICATION REVIEW COMPLETED	70138
Mar. 31, 2012	APPROVED FOR PUB - PRINCIPAL REGISTER	
Mar. 31, 2012	EXAMINER'S AMENDMENT ENTERED	70138
Mar. 30, 2012	ASSIGNED TO LIE	70138
Mar. 30, 2012	NOTIFICATION OF EXAMINERS AMENDMENT E-MAILED	6328
Mar. 30, 2012	EXAMINERS AMENDMENT E-MAILED	6328
Mar. 30, 2012	EXAMINERS AMENDMENT -WRITTEN	81111
Mar. 25, 2012	ASSIGNED TO EXAMINER	81111
Feb. 15, 2012	NOTICE OF DESIGN SEARCH CODE AND PSEUDO MARK MAILED	
Feb. 14, 2012	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Feb. 11, 2012	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Feb. 21, 2013

4% alc/vol

95 cal*

Air™

Alcohol Inspired Refresher

Citrus
Contains
Water
+ Alcohol

Carbonated

Premium Clear Malt Beverage
with Water and Natural Flavors
12 fl. oz

Exhibit 14

Generated on: This page was generated by TSDR on 2016-09-08 17:51:50 EDT

Mark: INSPIRED BY THE VINE. PERFECTED IN THE BREW KETTLE

INSPIRED BY THE VINE.
PERFECTED IN THE BREW
KETTLE

US Serial Number: 85688223

Application Filing Date: Jul. 26, 2012

US Registration Number: 4441119

Registration Date: Nov. 26, 2013

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Nov. 26, 2013

Publication Date: Nov. 13, 2012

Notice of Allowance Date: Jul. 09, 2013

Mark Information

Mark Literal Elements: INSPIRED BY THE VINE. PERFECTED IN THE BREW KETTLE

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Beer

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(a)

First Use: Nov. 19, 2012

Use in Commerce: Nov. 19, 2012

Basis Information (Case Level)

Filed Use: No

Currently Use: Yes

Amended Use: No

Filed ITU: Yes

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: MillerCoors LLC

Owner Address: 250 South Wacker Drive, Suite 800
Chicago, ILLINOIS 606065888
UNITED STATES

Legal Entity Type: LIMITED LIABILITY COMPANY

State or Country: DELAWARE
Where Organized:

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Hillary J. Wucherer

Docket Number: 134421.

Attorney Primary Email Address: tm-dept@quarles.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: HILLARY J. WUCHERER
QUARLES & BRADY LLP
411 E WISCONSIN AVE STE 2040
MILWAUKEE, WISCONSIN 53202-4426
UNITED STATES

Phone: 414 277 5000

Fax: 414 271 3552

Correspondent e-mail: tm-dept@quarles.com

Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Nov. 26, 2013	REGISTERED-PRINCIPAL REGISTER	
Oct. 22, 2013	NOTICE OF ACCEPTANCE OF STATEMENT OF USE E-MAILED	
Oct. 21, 2013	LAW OFFICE REGISTRATION REVIEW COMPLETED	68171
Oct. 21, 2013	ASSIGNED TO LIE	68171
Oct. 06, 2013	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
Sep. 11, 2013	STATEMENT OF USE PROCESSING COMPLETE	66530
Aug. 05, 2013	USE AMENDMENT FILED	66530
Aug. 30, 2013	CASE ASSIGNED TO INTENT TO USE PARALEGAL	66530
Aug. 05, 2013	TEAS STATEMENT OF USE RECEIVED	
Jul. 09, 2013	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
May 28, 2013	EXTENSION OF TIME TO OPPOSE PROCESS - TERMINATED	
Dec. 12, 2012	EXTENSION OF TIME TO OPPOSE RECEIVED	
Nov. 13, 2012	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Nov. 13, 2012	PUBLISHED FOR OPPOSITION	
Oct. 24, 2012	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Oct. 06, 2012	APPROVED FOR PUB - PRINCIPAL REGISTER	
Oct. 06, 2012	ASSIGNED TO EXAMINER	74816
Aug. 03, 2012	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Jul. 30, 2012	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Oct. 21, 2013

Proceedings

Summary

Number of Proceedings: 1

Type of Proceeding: Extension of Time

Proceeding Number: [85688223](#)

Filing Date: Dec 12, 2012

Status: Terminated

Status Date: May 28, 2013

**Interlocutory
Attorney:**

Defendant

Name: MillerCoors LLC

Correspondent Address: HILLARY J. WUCHERER
QUARLES & BRADY LLP
411 E WISCONSIN AVE STE 2040
MILWAUKEE WI , 53202-4426
UNITED STATES

Associated marks

Mark	Application Status	Serial Number	Registration Number
INSPIRED BY THE VINE. PERFECTED IN THE BREW KETTLE	Registered	85688223	4441119

Potential Opposer(s)

Name: BELL'S BREWERY, INC.

Correspondent Address: G. Patrick SAGE
HUESCHEN & SAGE, PLLC
107 West Michigan Avenue,Seventh Floor, Kalamazoo Building
Kalamazoo MI , 49007
UNITED STATES

Correspondent e-mail: gps@hueschen-sage.us , jtf@hueschen-sage.us

Prosecution History

Entry Number	History Text	Date	Due Date
1	INCOMING - EXT TIME TO OPPOSE FILED	Dec 12, 2012	
2	EXTENSION OF TIME GRANTED	Dec 12, 2012	
3	INCOMING - EXT TIME TO OPPOSE FILED	Mar 06, 2013	
4	EXTENSION OF TIME GRANTED	Mar 06, 2013	

VINTAGE ALE COLLECTION™
Inspired by the Vine. Perfected in the Brew Kettle.™

CRIMSON CROSSING™

At Blue Moon Brewing Company®, everything we do flows from our artistic approach to brewing. Our brewmaster created the Vintage Ale Collection to combine his passion for beer with his love for winemaking.

Crimson Crossing™ is crafted with the juice of Merlot grapes and wheat for intersecting notes of black cherries and raspberries with a smooth finish. It's a relaxing end to wherever the day may take you.

CA CRV MI 10¢ REFUND **CONTAINS SULFITES**
MA·NY·OR·ME·VT·HI·CT·IA 5¢ REFUND OK+

GOVERNMENT WARNING:
(1) ACCORDING TO THE SURGEON
GENERAL, WOMEN SHOULD NOT
DRINK ALCOHOLIC BEVERAGES
DURING PREGNANCY BECAUSE
OF THE RISK OF BIRTH DEFECTS
OR OTHER COMPLICATIONS.



841948-10

Exhibit 15

Generated on: This page was generated by TSDR on 2016-10-20 16:49:24 EDT

Mark: WORLD INSPIRED OHIO BREWED

WORLD INSPIRED OHIO BREWED

US Serial Number: 85887766

Application Filing Date: Mar. 27, 2013

US Registration Number: 4458079

Registration Date: Dec. 31, 2013

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Dec. 31, 2013

Publication Date: Oct. 15, 2013

Mark Information

Mark Literal Elements: WORLD INSPIRED OHIO BREWED

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Disclaimer: "OHIO BREWED"

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Beer, ale, lager, stout, porter, shandy; Beers

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(a)

First Use: Jun. 01, 2011

Use in Commerce: Jun. 01, 2011

Basis Information (Case Level)

Filed Use: Yes

Currently Use: Yes

Amended Use: No

Filed ITU: No

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: Columbus Brewing Company

Owner Address: 535 Short Street
Columbus, OHIO 43085
UNITED STATES

Legal Entity Type: CORPORATION

State or Country: OHIO

Where Organized:

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Leon Bass

Docket Number: CBC22 GN001

Attorney Primary Email Address: lbass@taftlaw.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: Leon David Bass
Taft Stettinius & Hollister LLP
65 E. State St. Ste 1000
Columbus, OHIO 43215
UNITED STATES

Phone: 614-431-2277

Fax: 614-221-2007

Correspondent e-mail: lbass@taftlaw.com leon@leonbass.com [trademar](#)
ks@taftlaw.com

Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Sep. 09, 2015	ATTORNEY REVOKED AND/OR APPOINTED	
Sep. 09, 2015	TEAS REVOKE/APPOINT ATTORNEY RECEIVED	
Sep. 09, 2015	TEAS CHANGE OF CORRESPONDENCE RECEIVED	
Dec. 31, 2013	REGISTERED-PRINCIPAL REGISTER	
Oct. 15, 2013	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Oct. 15, 2013	PUBLISHED FOR OPPOSITION	
Sep. 25, 2013	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Sep. 10, 2013	LAW OFFICE PUBLICATION REVIEW COMPLETED	70138
Sep. 09, 2013	ASSIGNED TO LIE	70138
Aug. 28, 2013	APPROVED FOR PUB - PRINCIPAL REGISTER	
Aug. 20, 2013	TEAS/EMAIL CORRESPONDENCE ENTERED	88889
Aug. 19, 2013	CORRESPONDENCE RECEIVED IN LAW OFFICE	88889
Aug. 19, 2013	TEAS RESPONSE TO OFFICE ACTION RECEIVED	
Jul. 17, 2013	NOTIFICATION OF NON-FINAL ACTION E-MAILED	6325
Jul. 17, 2013	NON-FINAL ACTION E-MAILED	6325
Jul. 17, 2013	NON-FINAL ACTION WRITTEN	76508
Jul. 09, 2013	ASSIGNED TO EXAMINER	76508
Apr. 02, 2013	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Mar. 30, 2013	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Dec. 31, 2013

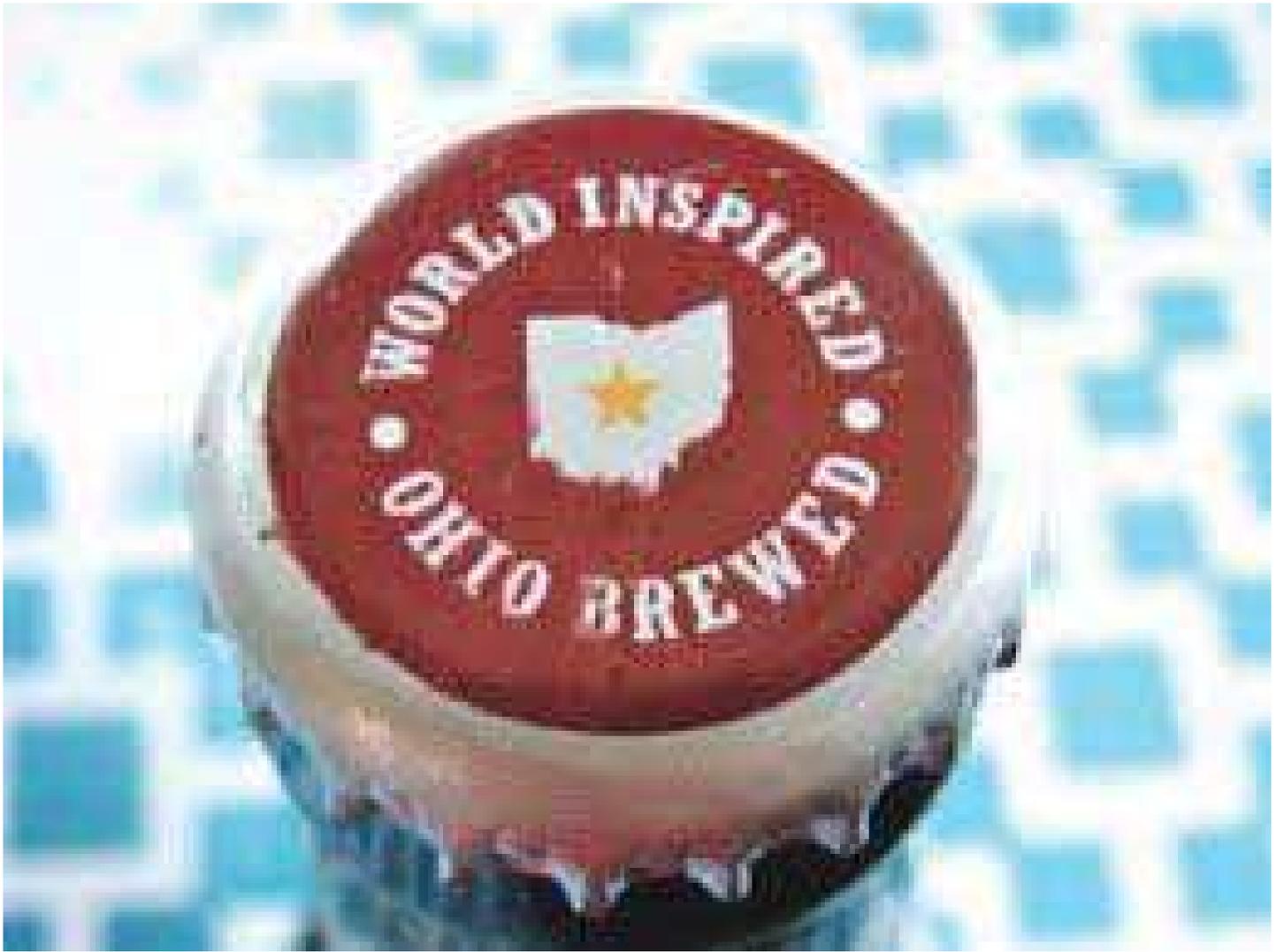


Exhibit 16

Generated on: This page was generated by TSDR on 2016-09-08 17:49:52 EDT

Mark: HAYES' INSPIRED OLD ALE PUBLIC HOUSE



US Serial Number: 85969542

Application Filing Date: Jun. 25, 2013

US Registration Number: 4536208

Registration Date: May 27, 2014

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: May 27, 2014

Publication Date: Mar. 11, 2014

Mark Information

Mark Literal Elements: HAYES' INSPIRED OLD ALE PUBLIC HOUSE

Standard Character Claim: No

Mark Drawing Type: 3 - AN ILLUSTRATION DRAWING WHICH INCLUDES WORD(S)/ LETTER(S)/NUMBER(S)

Description of Mark: The mark consists of the following: a tan, yellow, and black barrel with a six-pointed design figure centered on a black background enclosed in a thin white circle with a wide burgundy outer circle featuring the word "HAYES" in white lettering centered at the bottom of the circle. One thin white and one thin burgundy circle enclose the wide burgundy circle. Two symmetrical burgundy oblong shapes emanate from the left and right side of the barrel and bisect the concentric circles enclosing same. Inside the left burgundy oblong shape is the wording "INSPIRED" in white lettering. Inside the right burgundy oblong shape is the wording "OLD ALE" in white lettering. Three yellow sheaves of wheat appear from each side of the barrel in the center.

Color Drawing: Yes

Color(s) Claimed: The color(s) burgundy, yellow, tan, black and white is/are claimed as a feature of the mark.

Disclaimer: "PUBLIC HOUSE" AND "OLD ALE"

Design Search Code(s): 05.07.02 - Haystacks; Stalks (grain); Bundles, grain
19.05.01 - Barrels; Drums (barrels)
26.01.18 - Three or more concentric circles; Circles, three or more concentric; Concentric circles, three or more
26.01.21 - Circles that are totally or partially shaded.
26.11.21 - Rectangles that are completely or partially shaded

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((.)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Beer

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(a)

First Use: Sep. 09, 2012

Use in Commerce: Sep. 09, 2012

Basis Information (Case Level)

Filed Use: Yes	Currently Use: Yes	Amended Use: No
Filed ITU: No	Currently ITU: No	Amended ITU: No
Filed 44D: No	Currently 44D: No	Amended 44D: No
Filed 44E: No	Currently 44E: No	Amended 44E: No
Filed 66A: No	Currently 66A: No	
Filed No Basis: No	Currently No Basis: No	

Current Owner(s) Information

Owner Name: Hayes' Public House, L.L.C.
Owner Address: 510 Eagle Lake Road South
Big Lake, MINNESOTA 55309
UNITED STATES
Legal Entity Type: LIMITED LIABILITY COMPANY
State or Country Where Organized: MINNESOTA

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Timothy C. Matson
Attorney Primary Email Address: trademark@lommen.com
Docket Number: 40279
Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: Timothy C. Matson
Lommen Abdo PA.
920 Second Avenue South
1000 International Centre
Minneapolis, MINNESOTA 55402
UNITED STATES
Phone: 612-336-9331
Fax: 612-436-1478
Correspondent e-mail: trademark@lommen.com
Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Nov. 13, 2015	TEAS CHANGE OF CORRESPONDENCE RECEIVED	
May 27, 2014	REGISTERED-PRINCIPAL REGISTER	
Mar. 11, 2014	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Mar. 11, 2014	PUBLISHED FOR OPPOSITION	
Feb. 19, 2014	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Feb. 04, 2014	LAW OFFICE PUBLICATION REVIEW COMPLETED	70138
Feb. 04, 2014	ASSIGNED TO LIE	70138
Jan. 14, 2014	APPROVED FOR PUB - PRINCIPAL REGISTER	
Jan. 10, 2014	EXAMINER'S AMENDMENT ENTERED	88888
Jan. 10, 2014	NOTIFICATION OF EXAMINERS AMENDMENT E-MAILED	6328
Jan. 10, 2014	EXAMINERS AMENDMENT E-MAILED	6328
Jan. 10, 2014	EXAMINERS AMENDMENT -WRITTEN	90296
Dec. 14, 2013	TEAS/EMAIL CORRESPONDENCE ENTERED	88889
Dec. 13, 2013	CORRESPONDENCE RECEIVED IN LAW OFFICE	88889
Dec. 13, 2013	TEAS RESPONSE TO OFFICE ACTION RECEIVED	
Sep. 30, 2013	NOTIFICATION OF NON-FINAL ACTION E-MAILED	6325
Sep. 30, 2013	NON-FINAL ACTION E-MAILED	6325
Sep. 30, 2013	NON-FINAL ACTION WRITTEN	90296

Sep. 25, 2013 ASSIGNED TO EXAMINER
Aug. 15, 2013 ATTORNEY REVOKED AND/OR APPOINTED
Aug. 15, 2013 TEAS REVOKE/APPOINT ATTORNEY RECEIVED
Jul. 26, 2013 TEAS CHANGE OF CORRESPONDENCE RECEIVED
Jul. 26, 2013 TEAS CHANGE OF CORRESPONDENCE RECEIVED
Jul. 09, 2013 NOTICE OF DESIGN SEARCH CODE E-MAILED
Jul. 08, 2013 NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM
Jun. 28, 2013 NEW APPLICATION ENTERED IN TRAM

90296

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: May 27, 2014





Exhibit 17

Generated on: This page was generated by TSDR on 2016-09-08 17:48:31 EDT

Mark: INSPIRACION VALDEMAR LAS CANTERAS

INSPIRACION VALDEMAR LAS
CANTERAS

US Serial Number: 85865845

Application Filing Date: Mar. 04, 2013

US Registration Number: 4598101

Registration Date: Sep. 02, 2014

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Sep. 02, 2014

Publication Date: Nov. 05, 2013

Notice of Allowance Date: Dec. 31, 2013

Mark Information

Mark Literal Elements: INSPIRACION VALDEMAR LAS CANTERAS

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Translation: The English translation of "INSPIRACION" and "LAS CANTERAS" in the mark is "INSPIRATION" and "THE QUARRIES".

Related Properties Information

Claimed Ownership of US Registrations: 1545579, 3130915, 4232849

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((..)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Alcoholic beverages except beers

International Class(es): 033 - Primary Class

U.S Class(es): 047, 049

Class Status: ACTIVE

Basis: 1(a)

First Use: Nov. 14, 2013

Use in Commerce: Nov. 14, 2013

Basis Information (Case Level)

Filed Use: No

Currently Use: Yes

Amended Use: No

Filed ITU: Yes

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: Bodegas Valdemar, S.A.

Owner Address: Calle Camino Viejo, s/n
Oyon (Alava) 01320
SPAIN

Legal Entity Type: sociedad anonima (sa)

State or Country SPAIN
Where Organized:

Attorney/Correspondence Information

Attorney of Record

Attorney Name: J. Scott Gerien

Docket Number: SEAI001

Attorney Primary Email Address: tmdept@dpf-law.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: J. SCOTT GERIEN
DICKENSON, PEATMAN & FOGARTY
1455 1ST ST STE 301
NAPA, CALIFORNIA 94559-2822
UNITED STATES

Phone: 707-252-7122

Fax: 707-255-6876

Correspondent e-mail: tmdept@dpf-law.com

Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Sep. 02, 2014	REGISTERED-PRINCIPAL REGISTER	
Jul. 29, 2014	NOTICE OF ACCEPTANCE OF STATEMENT OF USE E-MAILED	
Jul. 28, 2014	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
Jul. 07, 2014	STATEMENT OF USE PROCESSING COMPLETE	65362
Jun. 12, 2014	USE AMENDMENT FILED	65362
Jul. 07, 2014	CASE ASSIGNED TO INTENT TO USE PARALEGAL	65362
Jun. 12, 2014	TEAS STATEMENT OF USE RECEIVED	
Dec. 31, 2013	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
Nov. 05, 2013	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Nov. 05, 2013	PUBLISHED FOR OPPOSITION	
Oct. 16, 2013	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Sep. 28, 2013	LAW OFFICE PUBLICATION REVIEW COMPLETED	68123
Sep. 27, 2013	ASSIGNED TO LIE	68123
Sep. 15, 2013	APPROVED FOR PUB - PRINCIPAL REGISTER	
Sep. 13, 2013	TEAS/EMAIL CORRESPONDENCE ENTERED	88889
Sep. 12, 2013	CORRESPONDENCE RECEIVED IN LAW OFFICE	88889
Sep. 12, 2013	TEAS RESPONSE TO OFFICE ACTION RECEIVED	
Mar. 18, 2013	NOTIFICATION OF NON-FINAL ACTION E-MAILED	6325
Mar. 18, 2013	NON-FINAL ACTION E-MAILED	6325
Mar. 18, 2013	NON-FINAL ACTION WRITTEN	74309
Mar. 18, 2013	ASSIGNED TO EXAMINER	74309
Mar. 08, 2013	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Mar. 07, 2013	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

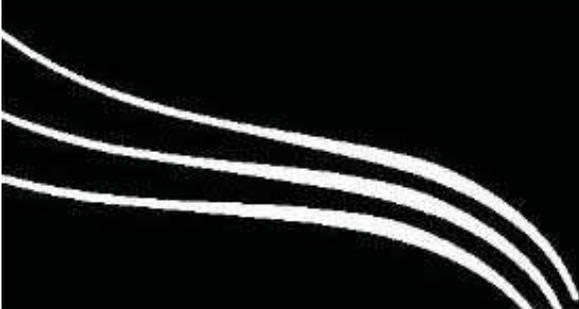
File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Jul. 28, 2014

Inspiración
Valdemar

Las Canteras 2010



Rioja

denominación de origen calificada

www.valdemar.es

Inspiración

Valdemar

Las Canteras

GOVERNMENT WARNING: (1) ACCORDING TO THE SURGEON GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES DURING PREGNANCY BECAUSE OF THE RISK OF BIRTH DEFECTS. (2) CONSUMPTION OF ALCOHOLIC BEVERAGES IMPAIRS YOUR ABILITY TO DRIVE A CAR OR OPERATE MACHINERY, AND MAY CAUSE HEALTH PROBLEMS.

IMPORTED BY: CIV (USA), SACRAMENTO, CA.



Alc. 14% by Vol. · 750 ml.

RED WINE

RIOJA

Denominación de Origen Calificada



**CONTAINS
SULFITES**

**PRODUCT
OF SPAIN**

Bottled by Bodegas Valdemar, S. A., Oyón, Spain · R.E. 5807-VI · REG.SANI. 30.03043-VI

Exhibit 18

Generated on: This page was generated by TSDR on 2016-09-08 18:02:45 EDT

Mark: INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON



US Serial Number: 86057625

Application Filing Date: Sep. 06, 2013

US Registration Number: 4635412

Registration Date: Nov. 11, 2014

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Nov. 11, 2014

Publication Date: Aug. 26, 2014

Mark Information

Mark Literal Elements: INSPIRED BY SPAIN · BREWED IN THE USA PALMIA LAGER CON LIMON

Standard Character Claim: No

Mark Drawing Type: 3 - AN ILLUSTRATION DRAWING WHICH INCLUDES WORD(S)/ LETTER(S)/NUMBER(S)

Description of Mark: The mark consists of the wording "Inspired By Spain" "Brewed In The USA" in stylized font. Directly below the wording is a triangular design. Within the triangular design is the wording "Palmia Lager Con Limon" in stylized font. Directly below the wording is a design of a lemon. Directly below that is a design that depicts a splash of water.

Color(s) Claimed: Color is not claimed as a feature of the mark.

Disclaimer: "INSPIRED BY SPAIN BREWED IN THE USA LAGER CON LIMON"

Translation: The wording "PALMIA" has no meaning in a foreign language.

Design Search Code(s): 01.15.25 - Sand; Spilling liquids; Coal; Dust; Light rays; Liquids, spilling; Pouring liquids
05.09.04 - Lemons; Limes
26.05.01 - Triangles as borders or carriers
26.17.01 - Bars, straight; Lines, straight; Bands, straight; Straight line(s), band(s) or bar(s)
26.17.05 - Bands, horizontal; Bars, horizontal; Horizontal line(s), band(s) or bar(s); Lines, horizontal

Name Portrait Consent: "PALMIA" does not identify a living individual.

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((..)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Beer

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(a)

First Use: May 21, 2013

Use in Commerce: Aug. 16, 2013

Basis Information (Case Level)

Filed Use: Yes	Currently Use: Yes	Amended Use: No
Filed ITU: No	Currently ITU: No	Amended ITU: No
Filed 44D: No	Currently 44D: No	Amended 44D: No
Filed 44E: No	Currently 44E: No	Amended 44E: No
Filed 66A: No	Currently 66A: No	
Filed No Basis: No	Currently No Basis: No	

Current Owner(s) Information

Owner Name: PALMIA CORPORATION
Owner Address: 3749 Divisadero St.
San Francisco, CALIFORNIA 94123
UNITED STATES
Legal Entity Type: CORPORATION
State or Country Where Organized: CALIFORNIA

Attorney/Correspondence Information

Attorney of Record - None

Correspondent

Correspondent Name/Address: PALMIA CORPORATION
3749 DIVISADERO ST
SAN FRANCISCO, CALIFORNIA 94123-1010
UNITED STATES

Correspondent e-mail: uspto@trademarks411.com

Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Nov. 11, 2014	REGISTERED-PRINCIPAL REGISTER	
Aug. 26, 2014	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Aug. 26, 2014	PUBLISHED FOR OPPOSITION	
Aug. 06, 2014	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Jul. 24, 2014	LAW OFFICE PUBLICATION REVIEW COMPLETED	70468
Jul. 21, 2014	APPROVED FOR PUB - PRINCIPAL REGISTER	
Jul. 21, 2014	EXAMINER'S AMENDMENT ENTERED	88888
Jul. 21, 2014	NOTIFICATION OF EXAMINERS AMENDMENT E-MAILED	6328
Jul. 21, 2014	EXAMINERS AMENDMENT E-MAILED	6328
Jul. 21, 2014	EXAMINERS AMENDMENT -WRITTEN	62920
Jul. 08, 2014	TEAS/EMAIL CORRESPONDENCE ENTERED	70468
Jul. 08, 2014	CORRESPONDENCE RECEIVED IN LAW OFFICE	70468
Jun. 27, 2014	ASSIGNED TO LIE	70468
Jun. 16, 2014	TEAS RESPONSE TO OFFICE ACTION RECEIVED	
Dec. 19, 2013	NOTIFICATION OF NON-FINAL ACTION E-MAILED	6325
Dec. 19, 2013	NON-FINAL ACTION E-MAILED	6325
Dec. 19, 2013	NON-FINAL ACTION WRITTEN	62920
Dec. 16, 2013	ASSIGNED TO EXAMINER	62920
Sep. 17, 2013	NOTICE OF DESIGN SEARCH CODE E-MAILED	
Sep. 14, 2013	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Sep. 10, 2013	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Nov. 11, 2014

INSPIRED BY SPAIN • BREWED IN THE USA

Palmita

LAGER CON LIMÓN



WHEN LIFE GIVES YOU LEMONS...

Exhibit 19

Generated on: This page was generated by TSDR on 2016-10-20 18:12:27 EDT

Mark: INSPIRED BY TASTE

Inspired by Taste

US Serial Number: 86438786

Application Filing Date: Oct. 29, 2014

US Registration Number: 4755944

Registration Date: Jun. 16, 2015

Register: Principal

Mark Type: Service Mark

TM5 Common Status Descriptor:



LIVE/REGISTRATION/Issued and Active

The trademark application has been registered with the Office.

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Jun. 16, 2015

Publication Date: Mar. 31, 2015

Mark Information

Mark Literal Elements: INSPIRED BY TASTE

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((.)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Retail stores featuring alcoholic beverages including wine, beer, cider, and fortified wine, non-alcoholic beverages, wine-related products, and wine club services in the nature of administration of a program for enabling participants to obtain discounts on wine products; online retail stores featuring wine, cider, fortified wine, wine-related products, and wine club services in the nature of administration of a program for enabling participants to obtain discounts on wine products

International Class(es): 035 - Primary Class

U.S Class(es): 100, 101, 102

Class Status: ACTIVE

Basis: 1(a)

First Use: Dec. 13, 2013

Use in Commerce: Dec. 13, 2013

Basis Information (Case Level)

Filed Use: Yes

Currently Use: Yes

Amended Use: No

Filed ITU: No

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: The Wine Feed, LLC
Owner Address: 602 Glenwood Avenue
Raleigh, NORTH CAROLINA UNITED STATES 27603
Legal Entity Type: LIMITED LIABILITY COMPANY
State or Country Where Organized: NORTH CAROLINA

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Anna Laura Collier

Attorney Primary Email Address: laura@thespiritedlawyer.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: ANNA LAURA COLLIER
Strike & Techel
1301 Wake Forest Road, Suite 204
Raleigh, NORTH CAROLINA UNITED STATES 27604

Phone: 415-226-1400

Correspondent e-mail: laura@strikeandtechel.com

Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Oct. 18, 2015	TEAS CHANGE OF CORRESPONDENCE RECEIVED	
Jun. 16, 2015	REGISTERED-PRINCIPAL REGISTER	
Mar. 31, 2015	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Mar. 31, 2015	PUBLISHED FOR OPPOSITION	
Mar. 11, 2015	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Feb. 19, 2015	APPROVED FOR PUB - PRINCIPAL REGISTER	
Feb. 18, 2015	ASSIGNED TO EXAMINER	76733
Nov. 08, 2014	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Nov. 01, 2014	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Jun. 16, 2015



Exhibit 20

Generated on: This page was generated by TSDR on 2016-10-20 18:13:13 EDT

Mark: NATIVE-INSPIRED FOODS & SPIRITS

NATIVE-INSPIRED FOODS &
SPIRITS

US Serial Number: 86539948

Application Filing Date: Feb. 19, 2015

US Registration Number: 4830684

Registration Date: Oct. 13, 2015

Filed as TEAS RF: Yes

Currently TEAS RF: Yes

Register: Principal

Mark Type: Service Mark

TM5 Common Status Descriptor:



LIVE/REGISTRATION/Issued and Active

The trademark application has been registered with the Office.

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Oct. 13, 2015

Publication Date: Jul. 28, 2015

Mark Information

Mark Literal Elements: NATIVE-INSPIRED FOODS & SPIRITS

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Disclaimer: "FOODS & SPIRITS"

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((.)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Microbrewery services; beer making and beer brewing services

International Class(es): 040 - Primary Class

U.S Class(es): 100, 103, 106

Class Status: ACTIVE

Basis: 1(a)

First Use: Aug. 26, 2014

Use in Commerce: Aug. 26, 2014

For: Restaurant, bar and take-out food services; brewpub services

International Class(es): 043 - Primary Class

U.S Class(es): 100, 101

Class Status: ACTIVE

Basis: 1(a)

First Use: Aug. 26, 2014

Use in Commerce: Aug. 26, 2014

Basis Information (Case Level)

Filed Use: Yes

Currently Use: Yes

Amended Use: No

Filed ITU: No

Currently ITU: No

Amended ITU: No

Filed 44D: No
Filed 44E: No
Filed 66A: No
Filed No Basis: No

Currently 44D: No
Currently 44E: No
Currently 66A: No
Currently No Basis: No

Amended 44D: No
Amended 44E: No

Current Owner(s) Information

Owner Name: Columbia Food Service Company, Inc.
Owner Address: 2025 E. 7th Avenue
Tampa, FLORIDA UNITED STATES 33605
Legal Entity Type: CORPORATION
State or Country Where Organized: FLORIDA

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Carla J. Vrsansky
Attorney Primary Email Address: carla.vrsansky@bipc.com
Docket Number: 2069435-05
Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: Carla J. Vrsansky
Buchanan Ingersoll & Rooney PC
301 Grant Street, 20th Floor
Pittsburgh, PENNSYLVANIA UNITED STATES 15219-1410
Phone: 412-562-1639
Fax: 412-562-1041
Correspondent e-mail: carla.vrsansky@bipc.com
Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Sep. 22, 2016	ATTORNEY REVOKED AND/OR APPOINTED	
Sep. 22, 2016	TEAS REVOKE/APPOINT ATTORNEY RECEIVED	
Oct. 13, 2015	REGISTERED-PRINCIPAL REGISTER	
Jul. 30, 2015	NOTICE OF PUBLICATION	
Jul. 28, 2015	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Jul. 28, 2015	PUBLISHED FOR OPPOSITION	
Jul. 08, 2015	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Jun. 19, 2015	LAW OFFICE PUBLICATION REVIEW COMPLETED	69712
Jun. 19, 2015	ASSIGNED TO LIE	69712
Jun. 01, 2015	APPROVED FOR PUB - PRINCIPAL REGISTER	
Jun. 01, 2015	EXAMINER'S AMENDMENT ENTERED	88888
Jun. 01, 2015	NOTIFICATION OF EXAMINERS AMENDMENT E-MAILED	6328
Jun. 01, 2015	EXAMINERS AMENDMENT E-MAILED	6328
Jun. 01, 2015	EXAMINERS AMENDMENT -WRITTEN	88574
May 23, 2015	ASSIGNED TO EXAMINER	88574
Mar. 07, 2015	NOTICE OF PSEUDO MARK E-MAILED	
Mar. 06, 2015	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Feb. 23, 2015	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Oct. 13, 2015



NOW ALSO OPEN FOR LUNCH

SUNDAY-THURSDAY 11 A.M.-10 P.M., FRIDAY AND SATURDAY, 11 A.M.-11 P.M.

Native-Inspired Foods & Spirits

[RESERVATIONS](#)

[FIND US](#)



ABOUT

Ulele (pronounced You-lay-lee) celebrates the vibrant fusion of ingredients from Florida waters and land once home to many Native Americans, including the young princess Ulele. Expect intricately flavored, visually appealing dishes prepared on the 10' diameter barbacoa grill. Now Open On Tampa's Riverwalk.

[VIEW ALL VIDEOS](#)

BREWERY

Native-Inspired Foods & Spirits

ON THE RIVERWALK, JUST NORTH OF DOWNTOWN TAMPA

BREWERY**Ulele Spring Brewery: From Grain To Glass**

The 2,100-square-foot Ulele Spring Brewery in front of our beer garden creates 15 U.S. barrels (465 gallons) per brew. We offer fresh-brewed lagers and ales using only the finest malted grains, hops, yeast, fresh fruit and locally sourced honey. We create these beers using American equipment with no artificial preservatives of any kind.

Brewery tours are available on request.

Ulele Spring Brewery On Tap

- Rusty Red
- Water Works Pale
- Ulele Light



Exhibit 21

Generated on: This page was generated by TSDR on 2016-09-08 18:04:33 EDT

Mark: CHALICE DIVINELY INSPIRED

CHALICE DIVINELY INSPIRED

US Serial Number: 86264467

Application Filing Date: Apr. 28, 2014

US Registration Number: 4998751

Registration Date: Jul. 12, 2016

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Jul. 12, 2016

Publication Date: Sep. 16, 2014

Notice of Allowance Date: Nov. 11, 2014

Mark Information

Mark Literal Elements: CHALICE DIVINELY INSPIRED

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Beer, ale, lager, stout and porter

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(a)

First Use: Apr. 12, 2016

Use in Commerce: Apr. 12, 2016

Basis Information (Case Level)

Filed Use: No

Currently Use: Yes

Amended Use: No

Filed ITU: Yes

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: ICONYC BREWING COMPANY LLC

Owner Address: 37-18 NORTHERN BLVD.
SUITE 020
LONG ISLAND CITY, NEW YORK 11101

UNITED STATES

Legal Entity Type: LIMITED LIABILITY COMPANY

State or Country: NEW YORK
Where Organized:

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Robert S. Broder

Attorney Primary Email Address: rsbroder@optonline.net

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: ROBERT S. BRODER
ROBERT S. BRODER, PLLC
2903 PRESTON LN
MERRICK, NEW YORK 11566-5216
UNITED STATES

Phone: 516.771.0349

Correspondent e-mail: rsbroder@optonline.net

Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Jul. 12, 2016	REGISTERED-PRINCIPAL REGISTER	
Jun. 07, 2016	NOTICE OF ACCEPTANCE OF STATEMENT OF USE E-MAILED	
Jun. 06, 2016	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
May 18, 2016	STATEMENT OF USE PROCESSING COMPLETE	74055
May 09, 2016	USE AMENDMENT FILED	74055
May 09, 2016	TEAS STATEMENT OF USE RECEIVED	
Oct. 10, 2015	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
Oct. 09, 2015	EXTENSION 2 GRANTED	74055
Oct. 06, 2015	EXTENSION 2 FILED	74055
Oct. 09, 2015	CASE ASSIGNED TO INTENT TO USE PARALEGAL	74055
Oct. 06, 2015	TEAS EXTENSION RECEIVED	
Sep. 23, 2015	AUTOMATIC UPDATE OF ASSIGNMENT OF OWNERSHIP	
Jun. 02, 2015	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
May 30, 2015	EXTENSION 1 GRANTED	66303
Apr. 30, 2015	EXTENSION 1 FILED	66303
May 30, 2015	CASE ASSIGNED TO INTENT TO USE PARALEGAL	66303
Apr. 30, 2015	TEAS EXTENSION RECEIVED	
Nov. 11, 2014	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
Sep. 16, 2014	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Sep. 16, 2014	PUBLISHED FOR OPPOSITION	
Aug. 27, 2014	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Aug. 09, 2014	APPROVED FOR PUB - PRINCIPAL REGISTER	
Aug. 09, 2014	ASSIGNED TO EXAMINER	83175
May 12, 2014	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
May 01, 2014	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Jun. 06, 2016

Assignment Abstract Of Title Information

Summary

Total Assignments: 1

Registrant: ICONYC BREWING COMPANY LLC

Assignment 1 of 1

Conveyance: CHANGE OF NAME

Reel/Frame: [5623/0065](#)

Pages: 5

Date Recorded: Sep. 15, 2015

Supporting Documents: [assignment-tm-5623-0065.pdf](#)**Assignor**Name: [QUEENS BREWERY LLC](#)

Execution Date: Jun. 11, 2015

Legal Entity Type: LIMITED LIABILITY COMPANY

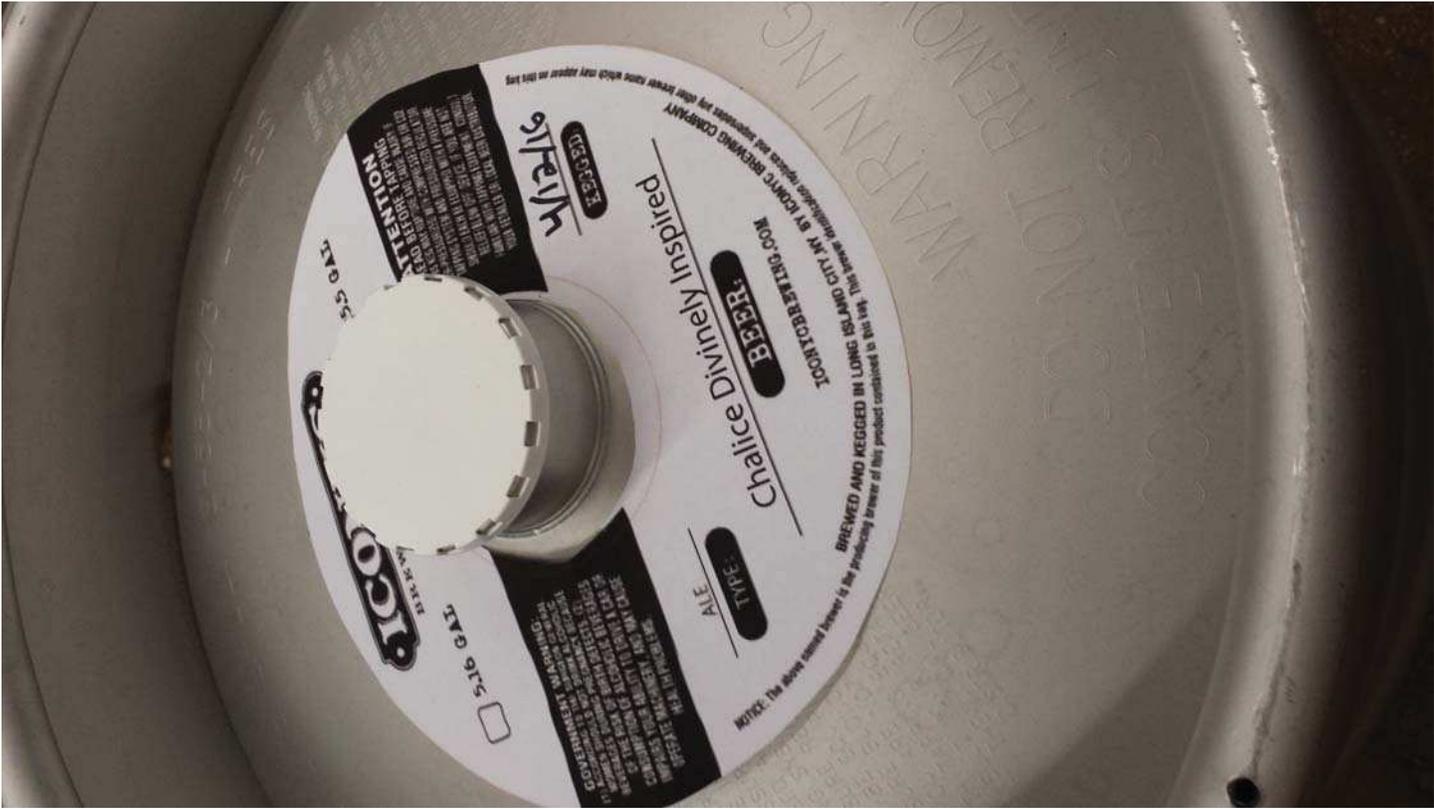
State or Country: NEW YORK
Where Organized:**Assignee**Name: [ICONYC BREWING COMPANY LLC](#)

Legal Entity Type: LIMITED LIABILITY COMPANY

State or Country: NEW YORK
Where Organized:Address: 37-18 NORTHERN BLVD.
SUITE 020
LONG ISLAND CITY, NEW YORK 11101**Correspondent**

Correspondent Name: ROBERT S. BRODER

Correspondent Address: 2209 MERRICK ROAD
SUITE 204
MERRICK, NY 11566**Domestic Representative - Not Found**



BEER
Chalice Divinely Inspired
TOUCHBEREING.COM

BEER

Chalice Divinely Inspired

TYPE:
ALE

5.5 GALS

300

5.16 GALS

BEER
Chalice Divinely Inspired
TOUCHBEREING.COM

TYPE:
ALE

BREWED AND KEGGED IN LONG ISLAND CITY BY KICMTC BREWING COMPANY

WARNING

DO NOT REMOVE

THIS LABEL

OR THE BEER WILL BE

INVALID FOR RETURN

FOR A REFUND

OR EXCHANGE

FOR A REFUND

OR EXCHANGE

ATTENTION

PLEASE READ THE

BEER LABEL FOR

IMPORTANT INFORMATION

AND TO AVOID

PROBLEMS WITH

YOUR BEER, PLEASE

KEEP THE BEER

REFRIGERATED

UNTIL YOU ARE

READY TO DRINK

IT. DO NOT OPEN

THE BEER UNTIL

YOU ARE READY

TO DRINK IT.

ATTENTION

PLEASE READ THE

BEER LABEL FOR

IMPORTANT INFORMATION

AND TO AVOID

PROBLEMS WITH

YOUR BEER, PLEASE

KEEP THE BEER

REFRIGERATED

UNTIL YOU ARE

READY TO DRINK

IT. DO NOT OPEN

THE BEER UNTIL

YOU ARE READY

TO DRINK IT.

Exhibit 22

Generated on: This page was generated by TSDR on 2016-10-20 15:09:58 EDT

Mark: INSPIRATION THROUGH FERMENTATION

INSPIRATION THROUGH
FERMENTATION

US Serial Number: 86588466

Application Filing Date: Apr. 06, 2015

US Registration Number: 5004388

Registration Date: Jul. 19, 2016

Register: Principal

Mark Type: Service Mark

TM5 Common Status Descriptor:



LIVE/REGISTRATION/Issued and Active

The trademark application has been registered with the Office.

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Jul. 19, 2016

Publication Date: Sep. 01, 2015

Notice of Allowance Date: Oct. 27, 2015

Mark Information

Mark Literal Elements: INSPIRATION THROUGH FERMENTATION

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Restaurant services; Bar and restaurant services

International Class(es): 043 - Primary Class

U.S Class(es): 100, 101

Class Status: ACTIVE

Basis: 1(a)

First Use: Jan. 2009

Use in Commerce: Mar. 2009

Basis Information (Case Level)

Filed Use: No

Currently Use: Yes

Amended Use: No

Filed ITU: Yes

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: BARFLY VENTURES, LLC

Owner Address: 35 Oakes Suite 400
GRAND RAPIDS, MICHIGAN UNITED STATES 49503

Legal Entity Type: LIMITED LIABILITY COMPANY

State or Country: MICHIGAN
Where Organized:

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Philip R. Warn

Docket Number: AGO-20009

Correspondent

Correspondent Name/Address: PHILIP R. WARN
Warn Partners P C
PO Box 70098
Rochester, MICHIGAN UNITED STATES 48307-0002

Phone: 248-364-4300

Fax: 248-364-4285

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Jul. 19, 2016	REGISTERED-PRINCIPAL REGISTER	
Jun. 17, 2016	NOTICE OF ACCEPTANCE OF STATEMENT OF USE MAILED	
Jun. 16, 2016	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
May 27, 2016	NOTICE OF APPROVAL OF EXTENSION REQUEST MAILED	
May 26, 2016	STATEMENT OF USE PROCESSING COMPLETE	66230
Apr. 27, 2016	USE AMENDMENT FILED	66230
May 26, 2016	EXTENSION 1 GRANTED	66230
Apr. 27, 2016	EXTENSION 1 FILED	66230
May 26, 2016	CASE ASSIGNED TO INTENT TO USE PARALEGAL	66230
Apr. 27, 2016	TEAS EXTENSION RECEIVED	
Apr. 27, 2016	TEAS STATEMENT OF USE RECEIVED	
Oct. 27, 2015	NOA MAILED - SOU REQUIRED FROM APPLICANT	
Sep. 23, 2015	ASSIGNMENT OF OWNERSHIP NOT UPDATED AUTOMATICALLY	
Sep. 01, 2015	PUBLISHED FOR OPPOSITION	
Aug. 12, 2015	NOTICE OF PUBLICATION	
Jul. 17, 2015	APPROVED FOR PUB - PRINCIPAL REGISTER	
Jul. 14, 2015	ASSIGNED TO EXAMINER	72152
Apr. 14, 2015	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Apr. 09, 2015	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Jun. 16, 2016

Assignment Abstract Of Title Information

Summary

Total Assignments: 1

Registrant: BARFLY VENTURES, LLC

Assignment 1 of 1

Conveyance: TRADEMARK SECURITY AGREEMENT

Reel/Frame: [5624/0445](#)

Pages: 9

Date Recorded: Sep. 16, 2015

Supporting Documents: [assignment-tm-5624-0445.pdf](#)

Assignor

Name: [BARFLY VENTURES, LLC](#)
Legal Entity Type: LIMITED LIABILITY COMPANY

Execution Date: Aug. 31, 2015
State or Country Where Organized: MICHIGAN

Name: [50 AMP FUSE, LLC](#)
Legal Entity Type: LIMITED LIABILITY COMPANY

Execution Date: Aug. 31, 2015
State or Country Where Organized: MICHIGAN

Assignee

Name: [CIP ADMINISTRATIVE, LLC](#)
Legal Entity Type: LIMITED LIABILITY COMPANY

State or Country Where Organized: TEXAS

Address: 3131 MCKINNEY AVENUE, SUITE 850
DALLAS, TEXAS 75204

Correspondent

Correspondent Name: JAIME T. WILLIS

Correspondent Address: 131 SOUTH DEARBORN STREET
SUITE 1700
CHICAGO, IL 60603-5559

Domestic Representative - Not Found



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<http://www.hopcatgr.com>

Deck open! Yeah, it's a little brisk - it ain't gonna kill you, precious. Grab	PCBG - PussyCatt Beer Guild @HopCat at	BEER 101 TODAY! April 18 @ 3PM - Beer 101 Professor Steve
--	--	---

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hộp cắt nỗi buồn

Gà mà không phải lợn

Mình không nghĩ muốn về. Chỉ nghĩ nhanh được đi làm, rồi về xong một bữa, thì lên level 10. Đắm chìm		Hoài niệm quá, những ngày xưa, năm cũ. Còn nhớ đoạn thời gian ấy, từng có bất bao thế nào không?
--	---	--



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HopCat does not have any activity yet.

Exhibit 23

Generated on: This page was generated by TSDR on 2016-10-21 13:08:32 EDT

Mark: NOVATEUR

NOVATEUR

US Serial Number: 86462896

Application Filing Date: Nov. 24, 2014

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Trademark

Status: A third request for extension of time to file a Statement of Use has been granted.

Status Date: Oct. 06, 2016

Publication Date: Feb. 03, 2015

Notice of Allowance Date: Mar. 31, 2015

Mark Information

Mark Literal Elements: NOVATEUR

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Translation: The English translation of "NOVATEUR" in the mark is "INNOVATION".

Related Properties Information

Claimed Ownership of US Registrations: 3538471

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((..)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Alcoholic beverages except beers

International Class(es): 033 - Primary Class

U.S Class(es): 047, 049

Class Status: ACTIVE

Basis: 1(b)

Basis Information (Case Level)

Filed Use: No

Currently Use: No

Amended Use: No

Filed ITU: Yes

Currently ITU: Yes

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: Jackson Family Farms, LLC

Owner Address: 421 Aviation Boulevard
Santa Rosa, CALIFORNIA 95403
UNITED STATES

Legal Entity Type: LIMITED LIABILITY COMPANY

State or Country CALIFORNIA
Where Organized:

Attorney/Correspondence Information

Attorney of Record

Attorney Name: J. Scott Gerien

Attorney Primary Email Address: tmdept@dpf-law.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: J. Scott Gerien
Dickenson, Peatman & Fogarty
1455 First Street, Ste 301
Napa, CALIFORNIA 94559
UNITED STATES

Phone: 707-252-7122

Fax: 707-255-6876

Correspondent e-mail: tmdept@dpf-law.com

Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Oct. 07, 2016	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
Oct. 06, 2016	EXTENSION 3 GRANTED	66530
Sep. 29, 2016	EXTENSION 3 FILED	66530
Sep. 29, 2016	TEAS EXTENSION RECEIVED	
Apr. 05, 2016	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
Apr. 02, 2016	EXTENSION 2 GRANTED	66530
Mar. 30, 2016	EXTENSION 2 FILED	66530
Mar. 30, 2016	TEAS EXTENSION RECEIVED	
Sep. 26, 2015	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
Sep. 25, 2015	EXTENSION 1 GRANTED	66530
Sep. 16, 2015	EXTENSION 1 FILED	66530
Sep. 25, 2015	CASE ASSIGNED TO INTENT TO USE PARALEGAL	66530
Sep. 16, 2015	TEAS EXTENSION RECEIVED	
Jun. 05, 2015	ATTORNEY REVOKED AND/OR APPOINTED	
Jun. 05, 2015	TEAS REVOKE/APPOINT ATTORNEY RECEIVED	
Mar. 31, 2015	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
Feb. 03, 2015	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Feb. 03, 2015	PUBLISHED FOR OPPOSITION	
Jan. 14, 2015	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Dec. 23, 2014	APPROVED FOR PUB - PRINCIPAL REGISTER	
Dec. 23, 2014	ASSIGNED TO EXAMINER	76151
Dec. 03, 2014	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Nov. 27, 2014	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information

TM Attorney: WILLIS, PAMELA Y

Law Office Assigned: LAW OFFICE 106

File Location

Current Location: INTENT TO USE SECTION

Date in Location: Sep. 25, 2015

Exhibit 24

Generated on: This page was generated by TSDR on 2016-09-27 14:11:31 EDT

Mark: ISLAND INSPIRED

ISLAND INSPIRED

US Serial Number: 86731313

Application Filing Date: Aug. 20, 2015

Filed as TEAS RF: Yes

Currently TEAS RF: Yes

Register: Principal

Mark Type: Trademark

Status: A first request for extension of time to file a Statement of Use has been granted.

Status Date: Sep. 08, 2016

Publication Date: Jan. 12, 2016

Notice of Allowance Date: Mar. 08, 2016

Mark Information

Mark Literal Elements: ISLAND INSPIRED

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((.)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Beer

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(b)

Basis Information (Case Level)

Filed Use: No

Currently Use: No

Amended Use: No

Filed ITU: Yes

Currently ITU: Yes

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: Lanikai Brewing Company LLC

Owner Address: 175-C Hamakua Drive
Kailua, HAWAII 96734
UNITED STATES

Legal Entity Type: LIMITED LIABILITY COMPANY

State or Country Where Organized: HAWAII

Attorney/Correspondence Information

Attorney of Record**Attorney Name:** Paul L. Havel**Docket Number:** 246770-2100**Attorney Primary Email Address:** trademark@millernash.com**Attorney Email Authorized:** Yes**Correspondent****Correspondent Name/Address:** PAUL L. HAVEL
Miller Nash Graham & Dunn LLP
111 SW 5th Ave Ste 3400
Portland, OREGON 97204-3614
UNITED STATES**Phone:** 503.224.5858**Fax:** 503.224.0155**Correspondent e-mail:** trademark@millernash.com liz.miller@millernash.com**Correspondent e-mail Authorized:** Yes**Domestic Representative - Not Found****Prosecution History**

Date	Description	Proceeding Number
Sep. 10, 2016	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
Sep. 08, 2016	EXTENSION 1 GRANTED	98765
Sep. 08, 2016	EXTENSION 1 FILED	98765
Sep. 08, 2016	TEAS EXTENSION RECEIVED	
Mar. 08, 2016	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
Jan. 12, 2016	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Jan. 12, 2016	PUBLISHED FOR OPPOSITION	
Dec. 24, 2015	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Nov. 21, 2015	APPROVED FOR PUB - PRINCIPAL REGISTER	
Nov. 18, 2015	ASSIGNED TO EXAMINER	76521
Aug. 25, 2015	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Aug. 24, 2015	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information**TM Staff Information****TM Attorney:** MIZELLE HOWARD, DEZMON**Law Office Assigned:** LAW OFFICE 110**File Location****Current Location:** INTENT TO USE SECTION**Date in Location:** Mar. 08, 2016

Exhibit 25

Generated on: This page was generated by TSDR on 2016-10-20 18:11:17 EDT

Mark: LIFE IS SWEET. BE INSPIRED.

Life is Sweet. Be Inspired.

US Serial Number: 86797177

Application Filing Date: Oct. 23, 2015

Filed as TEAS RF: Yes

Currently TEAS RF: Yes

Register: Principal

Mark Type: Trademark

Status: A first request for extension of time to file a Statement of Use has been granted.

Status Date: Aug. 16, 2016

Publication Date: Dec. 22, 2015

Notice of Allowance Date: Feb. 16, 2016

Mark Information

Mark Literal Elements: LIFE IS SWEET. BE INSPIRED.

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((.)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Beer; Coconut-based beverages not being milk substitutes; Fruit beverages; Fruit drinks and juices; Milk of almonds for beverage; Non-alcoholic beer; Non-alcoholic beverages, namely, carbonated beverages; Non-alcoholic cider; Non-alcoholic rice-based beverages not being milk substitutes; Sarsaparilla; Sherbet beverages; Smoothies; Sorbets in the form of beverages; Soy-based beverages not being milk substitutes; Vegetable juices; Water beverages

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(b)

Basis Information (Case Level)

Filed Use: No	Currently Use: No	Amended Use: No
Filed ITU: Yes	Currently ITU: Yes	Amended ITU: No
Filed 44D: No	Currently 44D: No	Amended 44D: No
Filed 44E: No	Currently 44E: No	Amended 44E: No
Filed 66A: No	Currently 66A: No	
Filed No Basis: No	Currently No Basis: No	

Current Owner(s) Information

Owner Name: MGF, Financial

Owner Address: PO Box 330
Barre, VERMONT 05641
UNITED STATES

Legal Entity Type: CORPORATION

State or Country Where Organized: VERMONT

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Kathryn G. Kent,

Attorney Primary Email Address: kathryn@kentlawpllc.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: KATHRYN G. KENT,
KENT LAW PRACTICE, PLLC
2 CHURCH STREET, SUITE 2G
BURLINGTON, VERMONT 05401
UNITED STATES

Phone: 802-498-7167

Correspondent e-mail: kathryn@kentlawpllc.com kathryn@kathrynkentlaw.com

Correspondent e-mail Authorized: Yes

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Aug. 18, 2016	NOTICE OF APPROVAL OF EXTENSION REQUEST E-MAILED	
Aug. 16, 2016	EXTENSION 1 GRANTED	98765
Aug. 16, 2016	EXTENSION 1 FILED	98765
Aug. 16, 2016	TEAS EXTENSION RECEIVED	
Feb. 16, 2016	NOA E-MAILED - SOU REQUIRED FROM APPLICANT	
Dec. 22, 2015	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Dec. 22, 2015	PUBLISHED FOR OPPOSITION	
Dec. 02, 2015	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Nov. 16, 2015	APPROVED FOR PUB - PRINCIPAL REGISTER	
Nov. 13, 2015	ASSIGNED TO EXAMINER	90338
Oct. 28, 2015	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Oct. 27, 2015	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information

TM Attorney: ESTELL, BRITTANY ANN

Law Office Assigned: LAW OFFICE 122

File Location

Current Location: INTENT TO USE SECTION

Date in Location: Feb. 16, 2016

Exhibit 26

Generated on: This page was generated by TSDR on 2016-09-08 17:34:22 EDT

Mark: IDRINX THE INNOVATIVE DRINKS COMPANY



US Serial Number: 79027453

Application Filing Date: May 16, 2006

US Registration Number: 3340213

Registration Date: Nov. 20, 2007

Register: Principal

Mark Type: Trademark

Status: A Section 71 declaration has been accepted.

Status Date: May 19, 2015

Publication Date: Sep. 04, 2007

Mark Information

Mark Literal Elements: IDRINX THE INNOVATIVE DRINKS COMPANY

Standard Character Claim: No

Mark Drawing Type: 3 - AN ILLUSTRATION DRAWING WHICH INCLUDES WORD(S)/ LETTER(S)/NUMBER(S)

Description of Mark: The mark consists of a stylized representation of a flying bird above a stylized banner bearing the term IDRINX and a stylized banner bearing the terms THE INNOVATIVE DRINKS COMPANY both connected by filigree.

Color(s) Claimed: Color is not claimed as a feature of the mark.

Disclaimer: DRINKS COMPANY

Design Search Code(s): 03.15.19 - Birds or bats in flight or with outspread wings

03.15.24 - Stylized birds and bats

03.15.25 - Crows; Robins; Ravens; Cardinals; Woodpeckers; Doves; Other birds; Pigeons

04.05.05 - Phoenix

24.09.07 - Advertising, banners; Banners

Related Properties Information

International Registration Number: 0894875

International Registration Date: May 16, 2006

Claimed Ownership of US Registrations: 3165452

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis (..) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Beer

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 66(a)

For: Alcoholic beverages, namely, wine, hard ciders, distilled spirits, and flavored brewed malt beverages

International Class(es): 033 - Primary Class

U.S Class(es): 047, 049

Class Status: ACTIVE

Basis: 66(a)

Basis Information (Case Level)

Filed Use: No

Currently Use: No

Amended Use: No

Filed ITU: No

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: Yes

Currently 66A: Yes

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: IBRANDS Limited

Owner Address: 1/211 Ben Boyd Road
Neutral Bay
Sydney NSW 2089
AUSTRALIA

Legal Entity Type: PRIVATE LIMITED COMPANY

State or Country Where Organized: HONG KONG

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Hope Hamilton

Attorney Primary Email Address: docket@hollandhart.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: Hope Hamilton
Holland & Hart LLP
P.O. Box 8749
ATTN: Trademark Docketing
Denver, COLORADO 80201
UNITED STATES

Correspondent e-mail: docket@hollandhart.com

Correspondent e-mail Authorized: Yes

Domestic Representative

Domestic Representative Name: Blakely, Sokoloff, Taylor & Zafman LLP

Prosecution History

Date	Description	Proceeding Number
Jul. 07, 2015	INVALIDATION REVIEWED - NO ACTION REQUIRED BY OFFICE	68359
May 19, 2015	NOTICE OF ACCEPTANCE OF SEC. 71 - E-MAILED	
May 19, 2015	REGISTERED-SEC.71 ACCEPTED	76533
May 15, 2015	ATTORNEY REVOKED AND/OR APPOINTED	
May 15, 2015	TEAS REVOKE/APPOINT ATTORNEY RECEIVED	
May 05, 2015	CASE ASSIGNED TO POST REGISTRATION PARALEGAL	76533
May 05, 2015	REINSTATED	67657
May 05, 2015	PETITION TO DIRECTOR - GRANTED	73373
Apr. 15, 2015	ASSIGNED TO PETITION STAFF	73373

Mar. 12, 2015	TEAS PETITION TO DIRECTOR RECEIVED	1111
Feb. 27, 2015	TOTAL INVALIDATION OF REG EXT PROTECTION CREATED	
Jun. 27, 2014	CANCELLED SECTION 71	76533
Nov. 21, 2013	POST REGISTRATION ACTION MAILED - SEC.71	76533
Nov. 20, 2013	CASE ASSIGNED TO POST REGISTRATION PARALEGAL	76533
Nov. 06, 2013	TEAS SECTION 71 RECEIVED	
Dec. 19, 2008	FINAL DECISION TRANSACTION PROCESSED BY IB	
Feb. 28, 2008	FINAL DISPOSITION NOTICE SENT TO IB	
Feb. 28, 2008	FINAL DISPOSITION PROCESSED	67445
Feb. 20, 2008	FINAL DISPOSITION NOTICE CREATED, TO BE SENT TO IB	
Feb. 15, 2008	CHANGE OF OWNER RECEIVED FROM IB	
Nov. 20, 2007	REGISTERED-PRINCIPAL REGISTER	
Sep. 04, 2007	PUBLISHED FOR OPPOSITION	
Aug. 15, 2007	NOTICE OF PUBLICATION	
May 24, 2007	LAW OFFICE PUBLICATION REVIEW COMPLETED	64657
May 22, 2007	APPROVED FOR PUB - PRINCIPAL REGISTER	
May 18, 2007	AMENDMENT FROM APPLICANT ENTERED	64657
May 18, 2007	CORRESPONDENCE RECEIVED IN LAW OFFICE	64657
May 18, 2007	ASSIGNED TO LIE	64657
Apr. 26, 2007	PAPER RECEIVED	
Nov. 10, 2006	REFUSAL PROCESSED BY IB	
Oct. 24, 2006	NON-FINAL ACTION MAILED - REFUSAL SENT TO IB	
Oct. 24, 2006	REFUSAL PROCESSED BY MPU	68359
Oct. 24, 2006	NON-FINAL ACTION (IB REFUSAL) PREPARED FOR REVIEW	
Oct. 23, 2006	NON-FINAL ACTION WRITTEN	76933
Oct. 17, 2006	ASSIGNED TO EXAMINER	76933
Sep. 29, 2006	NEW APPLICATION ENTERED IN TRAM	
Sep. 28, 2006	SN ASSIGNED FOR SECT 66A APPL FROM IB	

International Registration Information (Section 66a)

<p>International Registration Number: 0894875</p> <p>Priority Claimed Flag: Yes</p> <p>Intl. Registration Status: REQUEST FOR EXTENSION OF PROTECTION PROCESSED</p> <p>Notification of Designation Date: Sep. 28, 2006</p> <p>International Registration Renewal Date: May 16, 2016</p> <p>First Refusal Flag: Yes</p>	<p>International Registration Date: May 16, 2006</p> <p>Date of Section 67 Priority Claim: Jan. 06, 2006</p> <p>Date of International Registration Status: Sep. 28, 2006</p> <p>Date of Automatic Protection: Mar. 28, 2008</p>
--	---

Maintenance Filings or Post Registration Information

Affidavit of Continued Use: Section 71 - Accepted

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: GENERIC WEB UPDATE

Date in Location: May 19, 2015

Assignment Abstract Of Title Information

Summary

Total Assignments: 1

Registrant: Ibrands Limited

Assignment 1 of 1**Conveyance:** CHANGE OF ADDRESS**Reel/Frame:** [3719/0531](#)**Pages:** 2**Date Recorded:** Feb. 15, 2008**Supporting Documents:** [assignment-tm-3719-0531.pdf](#)**Assignor****Name:** [IBRANDS LIMITED](#)**Execution Date:** Nov. 13, 2007**Legal Entity Type:** UNKNOWN**State or Country Where Organized:** HONG KONG**Assignee****Name:** [IBRANDS LIMITED](#)**Legal Entity Type:** UNKNOWN**State or Country Where Organized:** NOT PROVIDED**Address:** 1/211 BEN BOYD ROAD
NEUTRAL BAY
SYDNEY NSW 2089, AUSTRALIA**Correspondent****Correspondent Name:** IBRANDS LIMITED**Correspondent Address:** LEVEL 57,
MLC CENTRE,
MARTIN PLACE
SYDNEY NSW 2000 AUSTRALIA**Domestic Representative - Not Found**

Exhibit 27

Generated on: This page was generated by TSDR on 2016-09-08 17:41:49 EDT

Mark: BARTH INNOVATIONS UNLOCKING THE POTENTIAL OF HOPS



US Serial Number: 79102162

Application Filing Date: Jun. 20, 2011

US Registration Number: 4120237

Registration Date: Apr. 03, 2012

Register: Principal

Mark Type: Service Mark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Apr. 03, 2012

Publication Date: Jan. 17, 2012

Mark Information

Mark Literal Elements: BARTH INNOVATIONS UNLOCKING THE POTENTIAL OF HOPS

Standard Character Claim: No

Mark Drawing Type: 5 - AN ILLUSTRATION DRAWING WITH WORD(S) /LETTER(S)/ NUMBER(S) INSTYLIZED FORM

Description of Mark: The mark consists of the wording "BARTH INNOVATIONS" in grey with the exclamation mark in orange above the wording "UNLOCKING THE POTENTIAL OF HOPS" in grey.

Color Drawing: Yes

Color(s) Claimed: The color(s) grey and orange is/are claimed as a feature of the mark.

Related Properties Information

International Registration Number: 1089740

International Registration Date: Jun. 20, 2011

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((..)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Telecommunications, namely, telecommunication access services, telecommunications by e-mail, transfer of data by telecommunications; providing user access to information in the Internet, namely, providing multiple use access to a global computer information network; communications by Internet, namely, providing telecommunications connections to the Internet or databases; communications by telephone; sending of messages and information by Internet, by e-mail and by telephone, in particular with regard to hops, for example hop growing, hop processing, operative ranges of hops

International Class(es): 038 - Primary Class

U.S Class(es): 100, 101, 104

Class Status: ACTIVE

Basis: 66(a)

For: Education, namely, providing workshops, seminars in the field of hops, extracts of hops, hop powder, hop-growing, hop processing, operative ranges of hops, use of hop in the brewing process, beer making, beer analysis, analysis of hop in beer; providing of training in the field of hops, extracts of hops, hop powder, hop-growing, hop processing, operative ranges of hops, use of hop in the brewing process, beer making, beer analysis, analysis of hop in beer; teaching in the field of hops, extracts of hops, hop powder, hop-growing, hop processing, operative ranges of hops, use of hop in the brewing process, beer making, beer analysis, analysis of hop in beer; education, namely, providing online-training and courses in the field of hops and beer, in particular hop-growing, hop processing, operative ranges of hops, use of hop in the brewing process, beer analysis, analysis of hop in beer, extracts of hops, hop powder; arranging and conducting of seminars; arranging and conducting of workshops; arranging and conducting of congresses for educational purposes; arranging and conducting of symposiums for educational purposes in the field of hops, extracts of hops, hop

powder, hop-growing, hop processing, operative ranges of hops, use of hop in the brewing process, beer making, beer analysis, analysis of hop in beer; personnel development by education, namely, providing classes to personnel in the field of hops, extracts of hops, hop powder, hop growing, hop processing, operative ranges of hops, use of hop in the brewing process, beer making, beer analysis, analysis of hop in beer; organization and conducting of further training and education programs in the nature of workshops in the field of hops, extracts of hops, hop powder, hop-growing, hop processing, operative ranges of hops, use of hop in the brewing process, beer making, beer analysis, analysis of hop in beer

International Class(es): 041 - Primary Class

U.S Class(es): 100, 101, 107

Class Status: ACTIVE

Basis: 66(a)

For: Scientific research, scientific and technological services, namely, research and design in the field of computer networking hardware; design services, namely, design of new product for others, namely, new hops cultivation and processing products; industrial analysis and research services, namely, chemical analysis of hops and industrial research in the field of hops, extracts of hops, hop powder, hop growing, hop processing, operative ranges of hops, use of hop in the brewing process, beer making, beer analysis, analysis of hop in beer; chemistry services, namely, chemistry consultation and research in the field of chemistry; services of a technical measuring and testing laboratory, namely, calibration services and material testing and product testing; packaging design; services in the area of process engineering, namely, consulting services in the field of design and development of engineering processes; chemical analysis; technical testing, namely, environmental testing and inspection services; conducting of scientific investigations for medical purposes; scientific research in the field of hops, extracts of hops and hop powder

International Class(es): 042 - Primary Class

U.S Class(es): 100, 101

Class Status: ACTIVE

Basis: 66(a)

For: Hygienic and beauty care for human beings and animals; agriculture, horticulture and forestry services, namely, agricultural advice, planting, growing, fertilizing, pruning, and picking hops for others; spreading of fertilizers and other agricultural chemicals; information and advice in the field of agriculture about hops, for example hop growing, hop processing, operative ranges of hops, in particular by telephone, Internet or e-mail

International Class(es): 044 - Primary Class

U.S Class(es): 100, 101

Class Status: ACTIVE

Basis: 66(a)

Basis Information (Case Level)

Filed Use: No

Currently Use: No

Amended Use: No

Filed ITU: No

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: Yes

Currently 66A: Yes

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: Joh. Barth & Sohn GmbH & Co. KG

Owner Address: Freiligrathstraße 7/9
90482 Nürnberg
GERMANY

Legal Entity Type: Limited partnership with a limited liability company

State or Country Where Organized: GERMANY

Attorney/Correspondence Information

Attorney of Record - None

Correspondent

Correspondent Name/Address: John A. Clifford
MERCHANT & GOULD PC
P.O. Box 9081
Minneapolis, MINNESOTA 55402
UNITED STATES

Phone: 612-332-5300

Fax: 612-332-9081

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Dec. 14, 2012	FINAL DECISION TRANSACTION PROCESSED BY IB	
Nov. 28, 2012	FINAL DISPOSITION NOTICE SENT TO IB	
Nov. 28, 2012	FINAL DISPOSITION PROCESSED	67445
Nov. 01, 2012	NOTIFICATION PROCESSED BY IB	
Jul. 03, 2012	FINAL DISPOSITION NOTICE CREATED, TO BE SENT TO IB	
Apr. 03, 2012	REGISTERED-PRINCIPAL REGISTER	
Feb. 01, 2012	UNDELIVERABLE MAIL - NO ACTION TAKEN	99888
Jan. 17, 2012	PUBLISHED FOR OPPOSITION	
Dec. 28, 2011	NOTIFICATION OF POSSIBLE OPPOSITION SENT TO IB	
Dec. 28, 2011	NOTICE OF START OF OPPOSITION PERIOD CREATED, TO BE SENT TO IB	
Dec. 28, 2011	NOTICE OF PUBLICATION	
Dec. 12, 2011	LAW OFFICE PUBLICATION REVIEW COMPLETED	68171
Dec. 09, 2011	ASSIGNED TO LIE	68171
Nov. 17, 2011	EXAMINERS AMENDMENT MAILED	
Nov. 16, 2011	APPROVED FOR PUB - PRINCIPAL REGISTER	
Nov. 16, 2011	EXAMINER'S AMENDMENT ENTERED	88888
Nov. 16, 2011	EXAMINERS AMENDMENT -WRITTEN	86332
Nov. 14, 2011	TEAS CHANGE OF CORRESPONDENCE RECEIVED	
Nov. 14, 2011	TEAS/EMAIL CORRESPONDENCE ENTERED	88889
Nov. 14, 2011	CORRESPONDENCE RECEIVED IN LAW OFFICE	88889
Nov. 14, 2011	TEAS RESPONSE TO OFFICE ACTION RECEIVED	
Oct. 23, 2011	REFUSAL PROCESSED BY IB	
Oct. 04, 2011	NON-FINAL ACTION MAILED - REFUSAL SENT TO IB	
Oct. 04, 2011	REFUSAL PROCESSED BY MPU	72589
Oct. 04, 2011	NON-FINAL ACTION (IB REFUSAL) PREPARED FOR REVIEW	
Oct. 03, 2011	NON-FINAL ACTION WRITTEN	86332
Sep. 29, 2011	ASSIGNED TO EXAMINER	86332
Sep. 27, 2011	APPLICATION FILING RECEIPT MAILED	
Sep. 23, 2011	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Sep. 22, 2011	SN ASSIGNED FOR SECT 66A APPL FROM IB	

International Registration Information (Section 66a)

International Registration Number: 1089740	International Registration Date: Jun. 20, 2011
Priority Claimed Flag: Yes	Date of Section 67 Priority Claim: Dec. 21, 2010
Intl. Registration Status: REQUEST FOR EXTENSION OF PROTECTION PROCESSED	Date of International Registration Status: Sep. 22, 2011
Notification of Designation Date: Sep. 22, 2011	Date of Automatic Protection: Mar. 22, 2013
International Registration Renewal Date: Jun. 20, 2021	
First Refusal Flag: Yes	

TM Staff and Location Information

TM Staff Information - None
File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Apr. 03, 2012

Exhibit 28

Generated on: This page was generated by TSDR on 2016-09-08 17:46:44 EDT

Mark: KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING.



US Serial Number: 86151953

Application Filing Date: Dec. 24, 2013

US Registration Number: 4575482

Registration Date: Jul. 29, 2014

Register: Principal

Mark Type: Trademark

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: Jul. 29, 2014

Publication Date: May 13, 2014

Mark Information

Mark Literal Elements: KIRIN ICHIBAN FROZEN BEER THE BEER INNOVATION FROM JAPAN. BEER WITH A REFRESHING FROZEN FOAM TOPPING.

Standard Character Claim: No

Mark Drawing Type: 3 - AN ILLUSTRATION DRAWING WHICH INCLUDES WORD(S)/ LETTER(S)/NUMBER(S)

Description of Mark: The mark consists of the design of a beer glass with a foam head, enclosed within an oval shape. Across the beer glass is a banner which reads "KIRIN ICHIBAN". Below the banner are Japanese characters which transliterate into English as "ICHIBAN SHIBORI", beneath which are the words "FROZEN BEER". The oval surrounding the beer glass reads "The beer innovation from Japan. Beer with a refreshing frozen foam topping".

Color(s) Claimed: Color is not claimed as a feature of the mark.

Disclaimer: "FROZEN BEER", "THE BEER INNOVATION FROM JAPAN", AND "BEER WITH A REFRESHING FROZEN FOAM TOPPING"

Translation: The English translation of "ICHIBAN" in the mark is "FIRST", "TOP", "THE NUMBER ONE", "ONE GAME" or "TRY ONLY ONCE".

Transliteration: The non-Latin characters in the mark transliterate to "ICHIBAN SHIBORI". "ICHIBAN" means "first, top, the number one, one game," or "try only once" in English. "SHIBORI" means "squeeze" or "press" in English.

Design Search Code(s): 01.15.09 - Snowflakes

11.03.02 - Beer steins or mugs; Cups, beer mugs; Mugs, beer; Tankards

24.09.07 - Advertising, banners; Banners

26.03.17 - Ovals within ovals; Concentric ovals and ovals within ovals; Concentric ovals; Ovals, concentric

28.01.03 - Chinese characters; Asian characters; Japanese characters

Related Properties Information

Claimed Ownership of US Registrations: 2746491, 3249685, 4433248 and others

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For: Beers

International Class(es): 032 - Primary Class

U.S Class(es): 045, 046, 048

Class Status: ACTIVE

Basis: 1(a)

First Use: Mar. 29, 2013

Use in Commerce: Mar. 29, 2013

Basis Information (Case Level)

Filed Use: Yes

Currently Use: Yes

Amended Use: No

Filed ITU: No

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: KIRIN KABUSHIKI KAISHA

DBA, AKA, Formerly: TA KIRIN Company, Limited

Owner Address: 10-2, Nakano 4-Chome
Nakano-Ku, Tokyo
JAPAN

Legal Entity Type: CORPORATION

State or Country Where Organized: JAPAN

Attorney/Correspondence Information

Attorney of Record

Attorney Name: Susan Upton Douglass

Docket Number: KIRI 1312333

Attorney Primary Email Address: sdouglass@frosszelnick.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: SUSAN UPTON DOUGLASS
FROSS ZELNICK LEHRMAN & ZISSU, P.C.
866 UNITED NATIONS PLZ
NEW YORK, NEW YORK 10017-1822
UNITED STATES

Phone: 212-813-5900

Fax: 212-813-5901

Correspondent e-mail: sdouglass@frosszelnick.com

Correspondent e-mail Authorized: Yes

Domestic Representative

Domestic Representative Name: Susan Upton Douglass

Phone: 212-813-5900

Fax: 212-813-5901

Domestic Representative e-mail: sdouglass@frosszelnick.com

Domestic Representative e-mail Authorized: Yes

Prosecution History

Date	Description	Proceeding Number
Jul. 29, 2014	REGISTERED-PRINCIPAL REGISTER	
May 13, 2014	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
May 13, 2014	PUBLISHED FOR OPPOSITION	
Apr. 23, 2014	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	

Mar. 31, 2014 APPROVED FOR PUB - PRINCIPAL REGISTER
Mar. 29, 2014 ASSIGNED TO EXAMINER
Jan. 14, 2014 NOTICE OF DESIGN SEARCH CODE E-MAILED
Jan. 11, 2014 NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM
Dec. 27, 2013 NEW APPLICATION ENTERED IN TRAM

72508

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Jul. 29, 2014



Beer with a refreshing frozen foam topping. The beer innovation from Japan.

KIRIN ICHIBAN
一番搾り
FROZEN
BEER



Exhibit 29



(/home)

- [Our Story \(/OurStory\)](#)
- [Our Beers \(/OurBeers\)](#)
- [Locator \(/locator\)](#)
- [Artists \(/roy-choi\)](#)
- [Brewery](#)

[Find Blue Moon](#)

(<https://www.bluemoonbrewingcompany.com/locator>)
 | [Shop](#)
 (https://avbypass.millercoors.com/Gate?url=http%3A//shop.bluemoonbrewingcompany.com/%3Fa%3D16-0819-brand-top-nav&utm_source=brand%20website&utm_medium=referral&utm_content=brand-top-nav&utm_campaign=16-0819-brand-top-nav)



(<https://www.bluemoonbrewingcompany.com/OurBeers-ipa>)



(<https://www.bluemoonbrewingcompany.com/contact>)



(<https://www.bluemoonbrewingcompany.com/roy-choi>)

Our Story

- [Approach \(/OurStory#Our-Approach-To-Brewing\)](#)
- [Awards \(/OurStory#Our-Awards\)](#)

Our Beers

- [Year-Round Releases \(/OurBeers#Year-Round-Releases\)](#)
- [Seasonal Collection \(/OurBeers#Seasonal-Collection\)](#)
- [Retired Ales \(/OurBeers#Retired-Ales\)](#)
- [Past Seasonals \(/OurBeers#Past-Seasonals\)](#)
- [Past Limited Releases \(/OurBeers#Past-Limited-Releases\)](#)

Artists (/roy-choi)

The Tank

- [Videos \(/videos\)](#)

Locator

- <https://www.bluemoonbrewingcompany.com/locator>
- [Contact Us](#)
- <https://www.bluemoonbrewingcompany.com/contact>

- <https://www.facebook.com/bluemoon>
- <https://twitter.com/bluemoonbrewco>
- <https://instagram.com/bluemoonbrewco>
- <http://www.youtube.com/user/BlueMoonBrewingCo>

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 ⚠ Links to other websites are available for your convenience. Blue Moon has no control over, does not necessarily endorse, and is not responsible for the content, advertising, products or other materials on or available from these websites. *Belgian-Style Wheat Ale.

Exhibit 30



BREWERY BEER TAPROOM EVENTS BREWERY RENTAL CONTACT BEER FINDER STORE



INSPIRATION

STYLE:
Belgian Strong Ale

ABV:	OG:	IBU:
9.6%	21.2	45



The quest to create Community Beer Company led us to evaluate many locations around Dallas for nearly two years before selecting our home on Inspiration Drive, near downtown on Stemmons Freeway.

What a great street name for our dream brewery to be built!

Without inspiration, we wouldn't be here to enrich our local community with world-class craft beer. In honor of all things inspirational, we offer this very special Belgian Style Dark Strong Ale.

The deep ruby hue of this ale comes from the use of several English and Belgian crystal malts as well as a touch of roasted malt. The rich malt character is balanced by a high ABV, a blend of highly attenuative and expressive Belgian yeast strains, and just the right amount of hops.

RELEASE CALENDAR



WINTER: DEC - FEB

1/4 KEG 1/2 KEG 4 PACK BOTTLES



BRONZE | 2013
US OPEN BEER CHAMPIONSHIP



SILVER | 2014
US OPEN BEER CHAMPIONSHIP



SILVER | 2015
US OPEN BEER CHAMPIONSHIP



BRONZE | 2016
LOS ANGELES INTERNATIONAL

OUR BREWS

ASCENSION
• COFFEE PORTER •

FALL

INSPIRATION
BELGIAN-STYLE DARK SPECIALTY ALE

WINTER

Funnel Cake Ale

STATE FAIR

BARREL AGED

LEGION
RUSSIAN IMPERIAL STOUT

WINTER

MOSAIC IPA
India Pale Ale

YEAR-ROUND

— COMMUNITY —
WITBIER

YEAR-ROUND

PUBLIC ALE
• ENGLISH-STYLE EXTRA SPECIAL BITTER •

YEAR-ROUND



[BREWERY](#) [BEER](#) [TAPROOM](#) [EVENTS](#) [BREWERY RENTAL](#) [CONTACT](#) [BEER FINDER](#) [STORE](#)


[GO TO TOP](#)

TAPROOM HOURS:

Wednesday & Thursday 5pm - 9pm
Friday & Saturday 5pm - 10pm

[CURRENTLY ON DRAFT](#)

OPEN HOUSE & TOURS:

Every Saturday 2pm - 5pm



COMMUNITY BEER CO.

1530 Inspiration Dr.
Dallas, TX 75207

[Contact Us](#)

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[ONLINE STORE](#) | [BEER FINDER](#) | [MEDIA LINKS](#) | [JOBS](#)

[PRESS RELEASES](#)

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Exhibit 31

[Home](#)[Our Beers](#)[Our Sodas](#)[Find Us On Tap](#)[Events](#)[Food](#)[Brewery](#)[Tap Room](#)[Location](#)[Retailers](#)[About Us](#)[Home](#) › [Our Beers](#)

Our Beers

(OT) This symbol indicates the beer is currently on tap in the LTS tap room.

(SB) This symbol indicates the beer is a small batch and not available for growler sales.

Karma – Kölsch (OT)

ABV 5.1% / IBU 25

Kölsch is a bright, straw-yellow beer originating in Cologne, Germany. This style has mild hop character, being less bitter than a standard German pale lager. Brewed in the style of an ale, but cold-conditioned in the style of a lager, this clean, refreshing beer is a good starter for those newer to craft beer.

FUN – Belgian-style Blond (OT)

ABV 6.9% / IBU 27

Currently On Tap at LTS

Karma
 Petite Saison D'Ete (2016)
 FUN
 Trinity
 Inspiration
 Origin
 Oktoberfest
 Manoomin
 Dunkelstiltskin
 Oatmeal

What's New

- [Happy 1 Year Anniversary LTS! - Jeff August 4, 2016](#)
- [Happy One Year Anniversary LTS! -](#)

Similar to a Belgian Tripel but lower alcohol and bitterness to make it easier to drink, this beer is a bright golden color with low hop character and lots of delicious flavor and aroma from Belgian Trappist yeast varieties.

Inspiration – American IPA (OT)

ABV 6.4% / IBU 60

Our IPA is crafted from a combination of American and New Zealand hops, both in the kettle and in the fermenter, to provide an intense hop flavor and aroma to accompany a pleasant bitterness and strong malt backbone.

[See the style profile for this beer](#)

El Dorado – Golden Ale

ABV 6.2% / IBU 44

This beer is considered a “playground” because our brewmaster uses it as a base for testing out new hop and malt varieties. Check out the chalkboard to see what varieties we are using today!

Bumbler – Brown Porter

ABV 5.7% / IBU 29

A little more bitter and toastier than a brown ale, this recipe walks the line between American Brown Ale and a Brown Porter.

Oatmeal – Oatmeal Stout (OT)

ABV 4.9% / IBU 32

Slightly sweeter than dry stout, but less-so than milk stout, our creamy, toasty oatmeal stout is almost like eating an oatmeal cookie – without all the chewing.

Petite Saison D’Ete – Belgian-style Saison

ABV 5.5% / IBU 24

[Brandon](#) August 4, 2016

- [June Brewer's Update](#) June 13, 2016
- [Brewer's Update](#) May 3, 2016
- [Style Profile: Irish Red Ale](#) March 10, 2016

Tap Room Hours

Monday-Thursday 3 p.m.-10 p.m.
Friday 3 p.m.-11 p.m.
Saturday 11 a.m.-11 p.m.
Sunday 11 a.m.-10 p.m.

Contact us at:
507-226-8280
support@ltsbrewing.com

Discounts

We offer a 20% public service discount to all police, sheriff, fire, and military members. **Thank you for your service!**

10% Discount for AHA members upon presenting AHA membership card!

Get a free pint on your Birthday!

Extremely light in color and very dry yet refreshing, this Belgian style keeps you coming back for more.

Petite Saison D'Ete (2016) – French-style Saison (OT)

ABV 5.0% / IBU 25

Dry and refreshing saison brewed for the hot summer days. We updated this recipe for 2016, using a French Saison yeast, European Pilsner malt, and a touch of wheat and Munich malts.

Browncoat – American Brown Ale

ABV 5.1% / IBU 24

English-inspired brown ale with notes of chocolate, caramel, and dark fruits.

Ctrl-Alt-Delete – Northern-German-style Altbier

ABV 5.1% / IBU 27

The Altbier is the darker sibling of our Kolsch. Caramel up front with hints of coffee as it finishes dry. Our brewer is showing how big a geek he really is with the name on this one.

[See the style profile for this beer](#)

Bruin – Belgian Style Strong Dark

ABV 10.8% / IBU 28

A nice sipper on crisp fall evenings, the Bruin is a cross between an English Barleywine and a traditional Belgian dark strong ale. Its aroma of cherries and toffee gives way to sweet chocolate and lingering treacle.

Petite Saison Framboise – Belgian-style Saison

ABV 5.1% / IBU 21



LTS Brewing...

Aged on fresh raspberries, the Petite Saison Framboise has a subtle raspberry aroma and a puckeringly dry finish with notes of grapefruit, lemon zest and orange peel.

Madelia – American Pale Ale

ABV 6.0% / IBU 36

Hopped with 100 pounds of wet Cascade from a family hop farm near Madelia, this harvest ale displays mild citrus with the terroir of south-eastern Minnesota.

Saison d’Vie – Belgian-style Saison

ABV 7.5% / IBU 26

Bittered with classic German hops, Saison d’Vie starts off bold – orange, pepper, lemongrass – but finishes slightly spicy and dry.

Ugly Pumpkin – Pumpkin Ale

ABV 6.5% / IBU 20

Introspection – American IPA

ABV 6.7% / IBU 63

This version of an American IPA exhibits more maltiness and tropical citrus flavors than our flagship Inspiration.

Illumination – Belgian-style IPA

ABV 6.5% / IBU 81

A generously late-hopped American IPA brewed with traditional Belgian yeast, this beer displays the typical fruity esters and spicy phenolics often found in Belgian Abbey ales.

Coaster Wagon – Irish Red Ale

ABV 5.6% / IBU 25

Americanized version of an Irish Red Ale with malty, roasty, chocolatey notes and a creamy mouth feel. Served on Nitro.

[See the style profile for this beer](#)

Suggestions

Trinity – Belgian-style Tripel (OT)

ABV 9.1% / IBU 48

Strong Belgian-style ale showcasing fruity esters and spicy phenolics of our Belgian yeast strains. Our version uses Sorachi Ace hops and finishes slightly sweet.

Hallucination – American Double IPA

ABV 9.3% / IBU 89

Inspiration cranked up to 11. Same hops, same malts, just way more of them.

Devotion – Belgian-style Dubbel

ABV 7.1% / IBU 22

This Belgian-style brown ale represents flavor of malty caramel, mild chocolate and dark fruits from a carefully chosen blend of malts, candi syrup, and Belgian yeast strain.

Quick Witted – Belgian-style Witbier

ABV 5.2% / IBU 26

A traditional Belgian-style witbier with a substantial amount of unmalted wheat, coriander, sweet & bitter orange peel.

Dunkelstiltskin – Munich-style Dunkel Lager (OT)

ABV 5.0% / IBU 23

Traditional dark Bavarian style lager with rich malt, bread crusts, mild nuttiness and toast flavors. We had to guess at a name for this one and were inspired by a German fairy-tale.

Biergarten – Helles Lager

ABV 4.8% / IBU 20

Made with 100% European Pils malt and German Northern Brewer Hops. A sweet aroma compliments a grainy-sweet malt flavor and a soft, dry finish. Best enjoyed outdoors!

Origin – Pale Ale (OT)

ABV 4.9% / IBU 37

This beer uses North Dakota malts and Cascade hops from MN. This light pale ale is refreshing with grapefruit, citrus and floral notes. Drink local!

Oktoberfest – Munich-style Marzen Lager (OT)

ABV 5.3% / IBU 26

Copper colored with a full-bodied maltiness, finishing a little spicy and dry. A classic beer for Fall!

Manoomin – Nut Brown Ale (OT)

ABV 5.7% / 27 IBU

One of our Fall seasonals for 2016, this Nut Brown is made with over 15% Minnesota wild rice in the grist. The wild rice brings out fruity and butty flavors that compliment a traditional Nut Brown recipe.



Exhibit 32

Inspiration through ferme x

hopcat.tumblr.com

Apps Docketing/Assistant Admin/Billing Private PAIR

Inspiration through fermentation  [+ Follow hopcat](#) **tumblr.**

MAY
01
2009

∞

Deck open!

Yeah, it's a little brisk - it ain't gonna kill you, precious. Grab your jacket, grab your dog if you have one and head on down!

1 note

Search

APR
20
2009

∞

PCBG - PussyCat Beer Guild @HopCat

Tuesday April 21 - 6.00pm -
Special Guest Leslie Pickell (The owner of **The Livery**) and the Chief Beer Geek's Beer Quiz. Also follow our Grail Quest-like saga as we attempt to find a new brew date!

What is the PCBG?
A loose group of women (not a group of loose women) who meet formally once a month and informally whenever to discuss and drink quality beer at HopCat. Very RESPONSIBLY and RESPECTFULLY, of course. If you're under 21 years of age you need not apply (yet).

25.Ionia.Ave.SW - Grand.Rapids.MI.49503 - 616.451.HOPS(4677)

www.hopcatgr.com

HopCat Map

1 note

Like What You See?
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About
<http://www.hopcatgr.com>

Tumblrroll


Tumblr powered
Bill Israel designed

APR
18
2009

∞

BEER 101

TODAY! April 18 @ 3PM - Beer 101
Professor Steve schools you on hops and other bittering agents of beer. While you're downtown, make some time to stop by the **Sidewalk Chalk Flood** and **Art Downtown**. Damn. GR's gettin' its cool on, huh?

Exhibit 33

First look inside HopCat D x

www.wxyz.com/lifestyle/food/first-look-inside-hopcat-detroit-a-new-bar-and-restaurant-opening-in-decemb

Apps Docketing/Assistant Admin/Billing Private PAIR

7 abc Home Sections Traffic

Weather

First look inside HopCat Detroit: a new bar and restaurant opening in December

POSTED: 11:27 PM, Oct 16, 2014
UPDATED: 3 hours ago



DETROIT - HopCat is betting on Detroit.

The bar and restaurant is opening up on Woodward Avenue in December, and the company is hoping to make a record-breaking debut in the Motor City.

Brad Galli takes WXYZ's cameras inside for the first look behind the scenes at the building.

TOP STORIES TRENDING NOW

- Brighton man charged in stomping deaths of 6 kittens - WXYZ.com
- Argument on Facebook may have sparked gang shooting that killed Detroit 3-year-old, wounded parents
- Mother beaten, dragged behind car in Dearborn; Surveillance video captures domestic violence attack
- Deadly dog virus strikes Ann Arbor, quickly kills six; Vets say it may spread from owners to pets
- WATCH LIVE AT 1:00 pm: ABC News Town Hall on Ebola - WXYZ.com

RECOMMENDED VIDEOS



Detroit man wants city to get rid of wall of trash

Exhibit 34

Recipes History Process **TENNEYSON** Culture Social Contact
ABSINTHE ROYALE



Royalty Inspired *Commonly Enjoyed*

CREATIVE & CURIOUS
Share your experiences and Tenneyson pics with us to be included in the Culture section.

FRIENDS WITH BENEFITS
Sign up to be an official Tenneyson Team Member to receive exclusive info, promos, and giveaways.

FINGER ON THE PULSE
Stay connected with Tenneyson and our inspirational community via Twitter and Facebook.

Exhibit 35



TWEETS
4,546

FOLLOWING
387

FOLLOWERS
11.1K

LIKES
1,072



Follow

Columbus Brewing Co.

@ColumbusBrewing

World Inspired, Ohio Brewed.

Columbus, OH

columbusbrewing.com

Joined March 2009

Tweet to Columbus Brewing Co.

192 Photos and videos

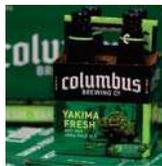


Tweets Tweets & replies Media



Columbus Brewing Co. @ColumbusBrewing · 5h

That packaging is 🔥🔥🔥



Superior Beverage @CbusSuperiorBev

Yakima Fresh Hop from @ColumbusBrewing is here—a wet-hopped IPA featuring hops shipped from farm to brewery within 24 hours of being picked

Retweet icon 2 Like icon 11 More icon



Columbus Brewing Co. Retweeted



Wonder Bar @WonderBarOH · Oct 19

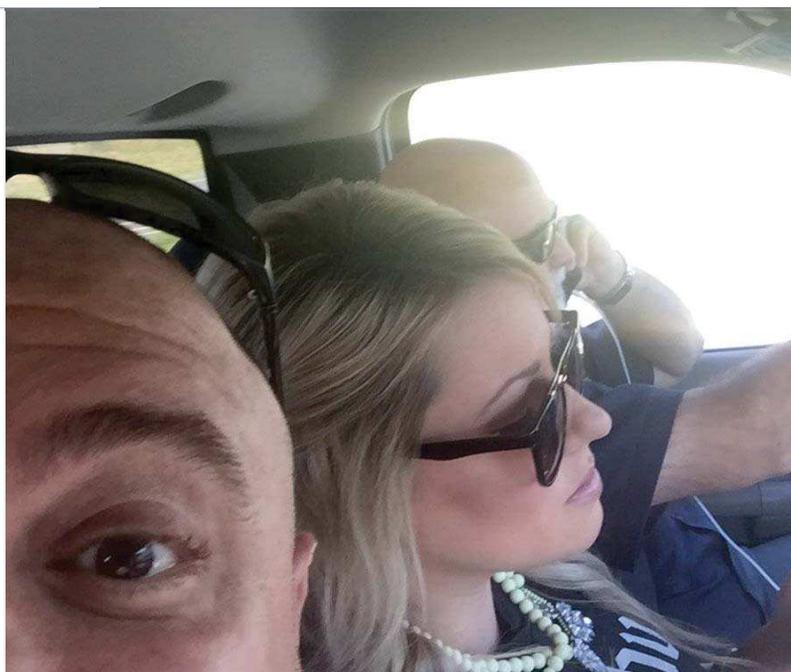
Columbus Bodhi DIPA now available on tap. brmn.us/1GA7f6c @ColumbusBrewing #BeerMenus

Retweet icon 1 Like icon More icon



Columbus Brewing Co. @ColumbusBrewing · Oct 19

This is commitment. After issues w 2 cars, now riding 3 across in a pickup on our way to @winkinglizard meeting & @clevelandbeerwk!



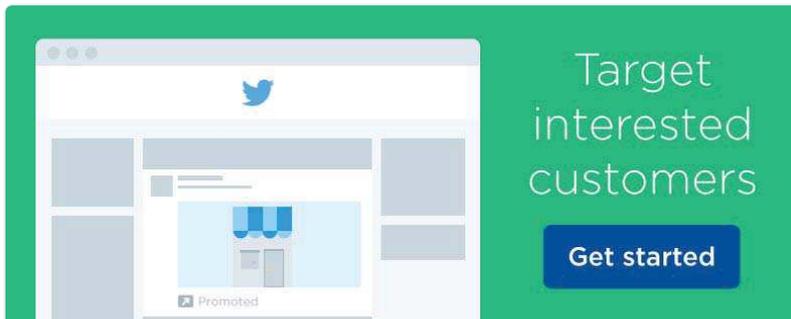
Reply icon Retweet 2 Like 13 More options

Promoted Tweet



Twitter for Business @TwitterBusiness · Aug 30

Want to grow your presence on Twitter? Reach more people with your Tweets using Twitter Ads.



Advertise on Twitter

ads.twitter.com

Promoted

Reply icon Retweet 60 Like 248 More options

Columbus Brewing Co. Retweeted



City Tap Cleveland @CityTapCLE · Oct 19

\$3 Beer of the Day: @ColumbusBrewing Thunderlips IPA on #draft! #GoTribe

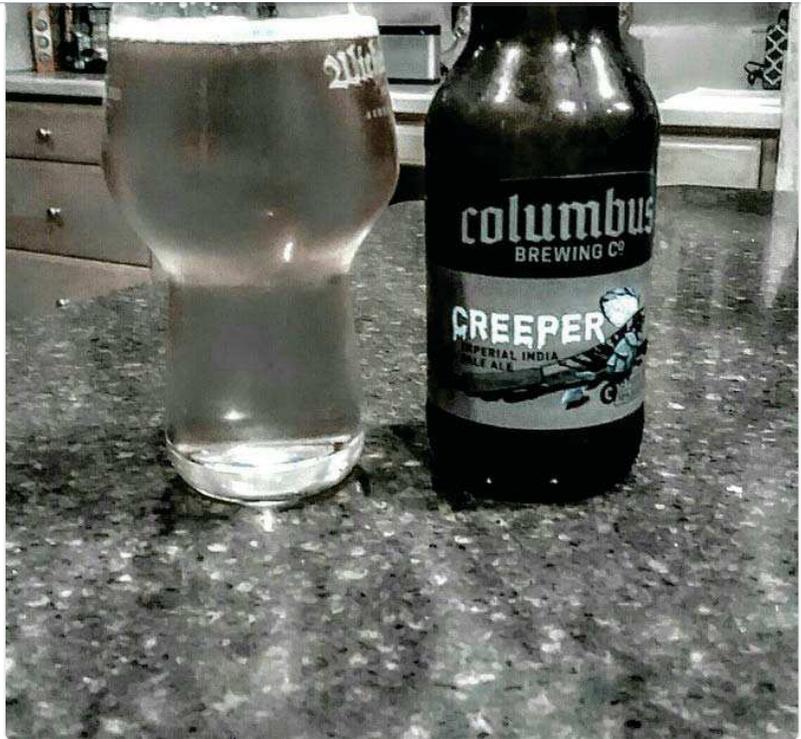
Reply icon Retweet 2 Like 3 More options

Columbus Brewing Co. Retweeted



david sidenstricker @DSidenstricker · Oct 17

MNF...and a great drink @ColumbusBrewing @PorchDrinkingCO



Retweet 1, Like 3, More options



Columbus Brewing Co. @ColumbusBrewing · Oct 17

Great pic! twitter.com/will03737/stat...

This Tweet is unavailable.

Retweet 1, Like 2, More options

Columbus Brewing Co. Retweeted



Jeffrey Sauter @ClevelandJeff · Oct 17

My favorite beer and my favorite team. Go Tribe!!! - Drinking a Creeper by @columbusbrewing -



Creeper by Columbus Brewing Company

Jeff drinking a Creeper by Columbus Brewing Company on Untappd untappd.com

Retweet 1, Like 2, More options

Columbus Brewing Co. Retweeted



Superior Beverage @CbusSuperiorBev · Oct 17

@ColumbusBrewing IPA is packed with simcoe, citra, mosaic and centennial hops for refreshing grapefruit, pine and tropical fruit notes





Retweet 2 Like 13

Columbus Brewing Co. Retweeted



Kent @instafriend1 · Oct 16

Can always count on my old buddy @Cadams012Adams for the post-race celebratory Bodhi! Thanks @ColumbusBrewing !!



Retweet 1 Like 5

Columbus Brewing Co. Retweeted



Mitch @mitchvaught · Oct 15

Chocolate and coffee in a cup - Drinking a Sohio Stout by @columbusbrewing at @citytapcle — untp.beer/s/c372059305 #photo

Reply Retweet 2 Like 5 More



Columbus Brewing Co. @ColumbusBrewing · Oct 15
A much better use of grain



Brad Perkins @baperkins35
Did not find bread at Bread Festival but did find this @ColumbusBrewing

Reply Retweet Like 7 More

Promoted Tweet



Windows @Windows · Oct 19
The Dell XPS 13 has a high-performance touchscreen. The MacBook Pro does not: wndw.ms/XDeNtK #Windows10

Promoted

Reply Retweet 1 Like 5 More

Columbus Brewing Co. Retweeted



J. Klaus @jklaus2010 · Oct 15
Finally found @ColumbusBrewing Bodhi and it was just bottled 10/10/16 #score #drinklocal

Reply Retweet 1 Like 3 More

Columbus Brewing Co. Retweeted



Mark Chaffin @markchaffin · Oct 15
Found some @ColumbusBrewing Bodhi available at Kroger in Powell. An excellent discovery for the OSU game tonight.

Reply Retweet 1 Like 4 More

Columbus Brewing Co. Retweeted



Evan Fischer @fisch_11 · Oct 14
Got a #Creaper in my living room. @ColumbusBrewing





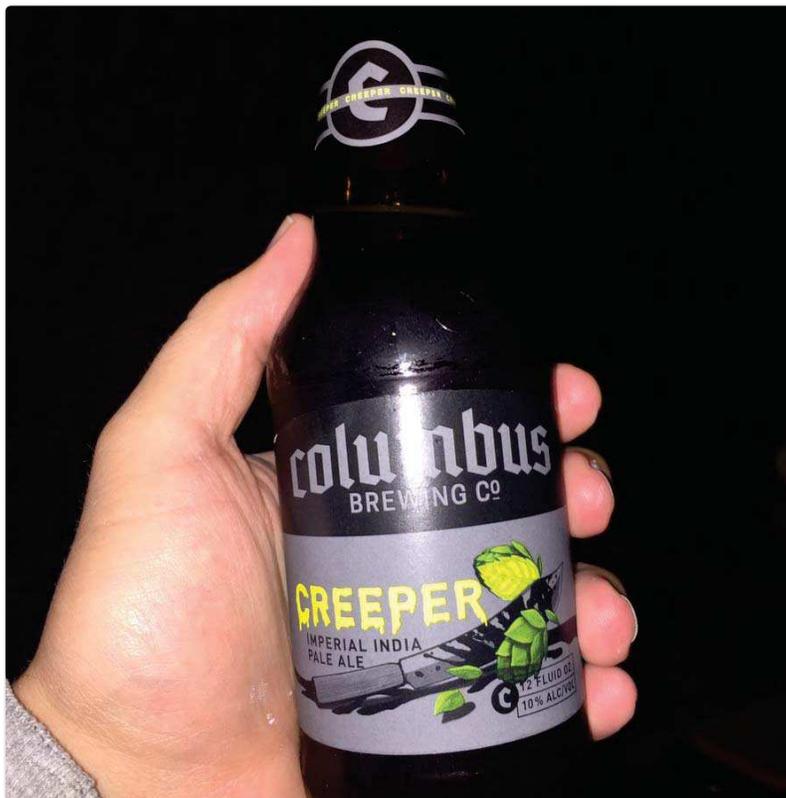
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Columbus Brewing Co. Retweeted



Troy Lammers @troylammers · Oct 14

@ColumbusBrewing this just may be the best beer I've ever had.



Retweet 3 Like 4



Columbus Brewing Co. @ColumbusBrewing · Oct 14

Ask a great beer store about it?

BDubbs25 @b_dubbs25

@ColumbusBrewing what's best way to locate some Bodhi bottles in the

Columbus Brewing Co. Retweeted
Bruce Cambell @AndrewHenryClev · Oct 14
 Drinking a Thunderlips by @columbusbrewing at @citytapcle —

← ↻ 1 ❤️ 2 ⋮

Columbus Brewing Co. Retweeted
 **NateR** @tribebrowns · Oct 14
 On tap - Good God - Drinking a Creeper by @columbusbrewing at @tremonttaphouse —

← ↻ 1 ❤️ 5 ⋮

Columbus Brewing Co. Retweeted
 **Glenn Grant** @beerguyGCG · Oct 14
 @ColumbusBrewing #Creeper #Bodhi bottles @Heinens
 #MentorOH #heinens #DIPA #craftbeer...just a few of each left

← ↻ 1 ❤️ 1 ⋮

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#SpiritDay 🇺🇸

@GeorgeTakei and
@nuunhydration are

#ShakeOut

@NovickOR, @PBOTinfo
and 1 more are Tweeting

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#ThursdayThoughts

#RadiotopiaChats

#DigitalCrossroads

Hall of Justice

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Exhibit 36



BREWING INNOVATION

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COMING SOON!



Let's Get Something Brewing.

Once you experience Blichmann Engineering equipment, you'll never want to go back. Find our premium products at homebrew stores worldwide.

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BoilerMaker™ G2
THE PERFECT KETTLE JUST

BoilCoil™
ELECTRIC IMMERSION

RIMS-Rocket™
ELECTRIC RIMS HEATER

BrewEasy™
REVOLUTIONARY COMPACT



Perfect Pots, Perfect Prices
Designed from the ground up and made of world-class material, the BoilerMaker™ G2 brew kettles sacrifice neither features nor quality and are available in perfect sizes.

LATEST NEWS

New Product Update

Blichmann Proudly Supports Brew Strong on the Brewing Network!

BeerGun Tips & Techniques

HopRocket - a versatile missile!

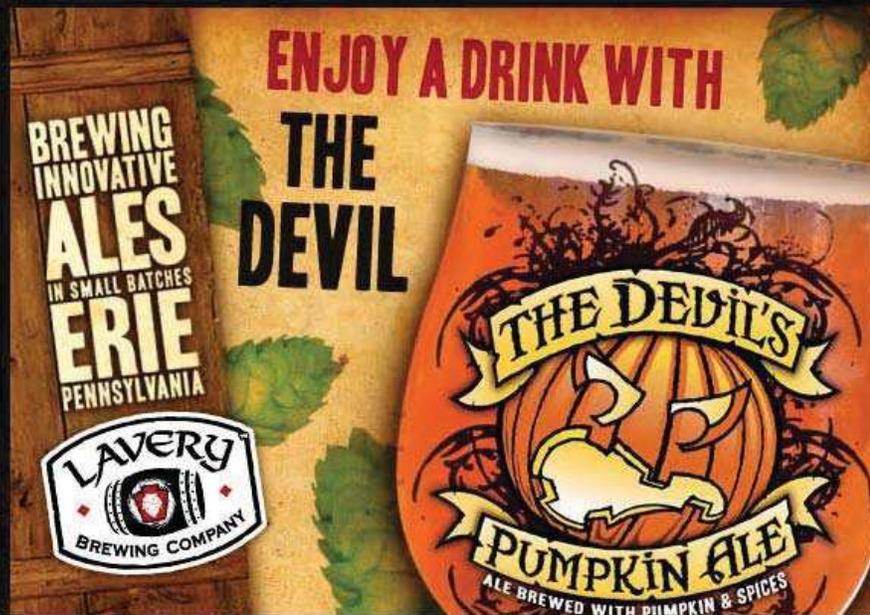
Exhibit 37



LAVERY BREWING COMPANY
BREWING INNOVATIVE ALES IN SMALL BATCHES



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1 2 3 4 5 6 7 8 9 10

About Us

Lavery Brewing Company was founded in 2009 by husband and wife Jason & Nicole Lavery. Jason Lynch joined the brewing quest in 2010 to build our own 10 barrel production brewery. Born and raised around Erie, PA, we are excited to bring something new and dynamic to the local beer culture - Brewing Innovative Ales in Small Batches!

By the way, it's pronounced 'Lav-ry' not 'Lave ry', a soft 'a' in the middle. Similar to 'have', not 'gave', thank you very much.



FOLLOW ON UNTAPPD



Liopare Or Farmhouse Ale won the **Gold Medal** for Belgian and French Saison at the **2013 Great American Beer Fest!**

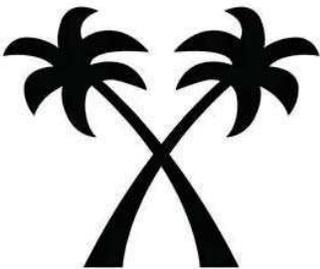
[Upcoming Festivals/Tastings](#)

[Pub Hours](#)

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Exhibit 38

Welcome Products Mash Monitor Bottle Shipping System Links Photos



CLARK BREWING INNOVATIONS
WWW.CLARKBREWING.COM
"Providing Innovative Solutions to the American Home Brewer"

Mash Monitor



Reduced Price \$70.00

Add to Cart

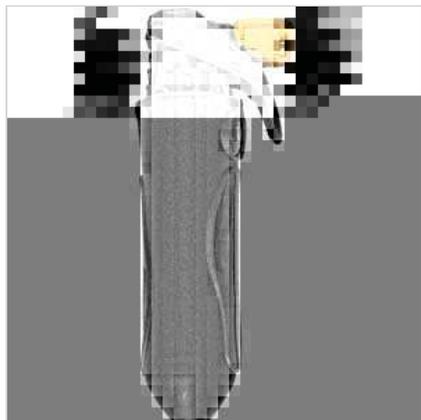
Countdown to another Homebrewing Innovation!

Checkout our new products!

Exhibit 39

[Home](#) » [Product Categories](#) » [Tools & Accessories](#) » [Cornelius Keg CO2 Charger](#)

Cornelius Keg CO2 Charger



Part Number: G5040

Are you a home brewer? Well then, we have the kit for you! Finally, there is a compact yet powerful solution to charging your kegs! Introducing the Cornelius Keg Charger by Genuine Innovations!

- Portable - Small and light weight. No tanks or hoses required
- Fast - Charges a Cornelius Keg in seconds
- Easy to use - Trigger valve allows for precise gas control

Put those over sized tanks and hoses to rest and invest in a Cornelius Keg Charger. The right tool for the job. Let the tasting begin!

Share This Product

More Information

- [Product Specs](#)
- [SDS Sheets](#)



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- Upper Hand Brewery Gear
- Homebrewing Supplies

NEW PRODUCTS

Hopslam Ale Raglan Pullover Hooded Sweatshirt w/ Free Two Hearted T-Shirt
~~\$50.00~~ \$20.00
 Not Rated

CHOOSE OPTIONS

Sodium Hydroxide - 4 oz
 \$3.95
 Not Rated

CHOOSE OPTIONS

Home Winemakers Companion Spaziani
 \$18.99
 Not Rated

CHOOSE OPTIONS

Clone Brews - Szamatulski
 \$18.99
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CHOOSE OPTIONS

Spare 2000 lb Gauge for Regulator
 \$11.65
 Not Rated

CHOOSE OPTIONS

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Kalamazoo, MI 49007

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(269) 382-5712

HOURS

Home > Homebrewing Supplies > Draft Supplies & Kegging Equipment > Cornelius Keg CO2 Charger

CORNELIUS KEG CO2 CHARGER



Price: \$19.80
 SKU: RET7250000016
 Brand: Genuine Innovations
 Weight: 0.5000 LBS
 Quantity: 1

Add:
 \$1.90 Qty

Total: \$19.80

Add to Cart



Description Similar Products Reviews

PRODUCT DESCRIPTION

Instantly charge your corny keg anywhere with this portable, fast and easy to use keg charger by Genuine Innovations.

No need for tanks or hoses with this small and lightweight device.

Trigger valve allows precise control of gas, while charging your corny keg in seconds.

RELATED PRODUCTS



The Original Keg Cleaner
 \$30.10
 Not Rated



Keg Cleaner Replacement Pads
 \$12.80
 Not Rated



Keg Charger CO2 Refill - 16 gm
 \$1.90
 Not Rated



Aluminum CO2 Cylinder - 5 lb Empty

CUSTOMER VIEWS

Brewer Equipment \$170.00 Not Rated

Keg Ch \$1.90 Not Rated

Aluminum Empty \$90.65 Not Rated

YOU RE VIEWS

Corn \$19.80 Not Rated

10 AM - 9 PM Monday- Thursday
10 AM - 10 PM Friday - Saturday
11 AM - 7 PM Sunday

\$90.65

CURRENT PROMOTIONS

Bell's Gear Clearance
Click here for all Bell's Gear on Clearance!

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ROUGH DRAFTS

Innovation in taste

Innovation is a hallmark of life in Alaska, and that applies to Alaskan Brewing Co. as well. And innovation has never tasted as good as Alaskan Rough Drafts—small batches of specialty brews made by our Brew Crew and sold on draft only. The program is part research and development, part cross-training and all fun. Under the guidance of a brewer, teams of brewery employees from other departments get together to research, discuss and ultimately brew a Rough Draft beer. The program enables everyone from accounting and sales to maintenance and packaging to have the opportunity to brew a specialty beer on our 1-barrel or 10-barrel systems for release to the beer-drinking public.

There are now two iterations of the Rough Draft program - "Limited" and "Export."



Rough Draft LIMITED Series

Alaskan Brewing Company's Rough Draft Limited series of products are created in Alaskan's original 10-barrel brewhouse. Each recipe is the result of experimentation perfected by our Brew Crew to showcase different styles and techniques. These brews are available on draft in very limited quantities and only in our home state of Alaska.

Rough Draft EXPORT Series

LINKS

OUR BREW

- Year Round Beers
- Amber
- White
- Stout
- IPA
- Freeride APA
- Hopothermia
- Seasonal Beers
- Summer Ale
- Fall Seasonal - Pumpkin Porter
- Winter Ale
- Spring Release
- Limited Edition
- Smoked Porter
- Pilot Series
- Perseverance Ale
- Baltic Porter
- Barley Wine
- Raspberry Wheat
- Double Black IPA
- Alaskan Imperial IPA
- Alaskan Birch Bock
- Alaskan Imperial Red Ale
- Pumpkin Porter
- Tropelbock
- Jalapeno Imperial IPA
- Rough Drafts
- Rough Draft Limited
- Rough Draft Export
- Awards
- Find Our Beer
- Brew Finder

Exhibit 41



- BRANDS
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HOME > INNOVATION

Innovation



DEDICATION TO INNOVATION

An Innovative Spirit

With the aim of making beer from a can taste just as good as beer from a tap, Bill Coors and his team developed the first recyclable aluminum beer can in 1959. Not only did they reduce waste, since aluminum is 100% recyclable, they also promptly made it available to the rest of the beverage world.

The pioneering spirit of our founding families lives on today with innovation as our new frontier. We are always looking for ways to challenge the expected and bring something new and exciting to our beer drinkers. Today, our packaging innovations add ease, comfort and style to the drinking experience. We bring Coors Light's Rocky Mountain cold refreshment to life through Cold Activated Bottle and Cans; deliver the perfect pint in the comfort of your home with our new home draft system; and offer aluminum pint bottles for a range of outdoor occasions.

Our brewmasters are also always working to delight our beer drinkers whether it's our Belgian inspired craft beer Blue Moon, or the low-calorie Molson Canadian 67, proudly brewed with precision and consistency. In Fall 2012, Rickard's also started launching a series of seasonal beers and will continue to develop new brews to excite our drinkers' palates.

At Molson Coors, we never stop learning from the people who drink our beer and delighting them will always be the biggest driver behind our innovation.



DELIGHTING OUR BEER DRINKERS

What you get when you combine our passion for great brewing with curiosity and creativity.

[READ MORE ▶](#)

INNOVATION IN MOTION



TASTE DISCOVERY PROGRAM

"After conducting significant research, we found that there was nothing in the selling environment to help consumers make choices based on taste. So the team decided to create a Taste Asset System, built the materials and implemented it in stores."

[VIEW ALL INNOVATION VIDEOS ▶](#)



BREWMASTER

"A huge amount of innovation depends on failure and taking risks."

[VIEW ALL INNOVATION VIDEOS ▶](#)

