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

Proceeding	91216934
Party	Defendant Wolfe, Alexander
Correspondence Address	ALEXANDER WOLFE 1180 AVENUE OF THE AMERICAS STE 820 NEW YORK, NY 10036-8401 UNITED STATES blabme@gmx.com
Submission	Reply in Support of Motion
Filer's Name	Alexander Wolfe
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Date	10/10/2014
Attachments	blabme Inital Disclosures 91216934.pdf(112037 bytes )

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

Alexander Wolfe  
1180 Avenue of the Americas, Suite 820  
New York, NY 10036  
UNITED STATES

V.

Blab, Inc.  
915 East Pine Street, #304  
Seattle, WA 98122  
UNITED STATES

Opposition No. 91216934  
Serial No. 85869103

Mark:  
BLABME

**APPLICANT ALEXANDER WOLFE'S INITIAL DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(1) and 37 C.F.R. § 1.120(a), Applicant Alexander Wolfe ("Applicant") makes the initial disclosures set forth below. These disclosures are based on information reasonably and currently available to the Applicant. The Applicant reserves the right to make further disclosures based on information developed in the course of this proceeding through discovery or additional factual investigation. By making these disclosures, the Applicant does not concede that all of the information disclosed herein is relevant, and does not in any way waive or intend to waive the right to object to the introduction into evidence of the information provided in this disclosure, and the right to object to any inspection, demand or discovery involving this disclosure or the subject matter thereof.

**I. Individuals likely to have discoverable information that the Applicant may use to support its claims**

The following is a list of individuals likely to have discoverable information that the Applicant may use to support its claims in this proceeding, and the subject matter of such information:

Name and Contact Information	Subject Matter
Alex Wolfe 'Applicant' blabme@gmx.com	The Applicant's trademark applications. The Applicant's common law rights with the mark. The Applicant's first use of the mark. The goods and services offered by the Applicant.
Officers and employees of Opposer May be contacted through Opposer's counsel	The Applicant anticipates that officers, employees, agents and/or representatives of the Opposer are reasonably likely to have discoverable information that the Applicant may use to support claims in this action, including information concerning the Opposer's selection, adoption, and use of the Opposer's mark. The Applicant will supplement this disclosure if and when it becomes aware of the identity of such officers and employees of the Opposer.

The Applicant anticipates that as discovery continues, it may discover additional individuals, including third-party witnesses, who may have information relevant to factual matters relating to this proceeding. The Applicant reserves the right to supplement or modify the above list as additional information becomes available through discovery or through additional factual investigation. The fact that persons are identified in these initial disclosures shall not constitute a waiver of any privileged communication to which such person( s) may have been a party.

## II. Documents that the Applicant may use to support its claims

At this early stage of discovery, the Applicant identifies the following categories of documents in the possession, custody or control of the Applicant or its counsel that it may use to support its claims in this case:

1. The Applicant's trademark applications and the corresponding file histories.
2. Evidence of the use and promotion of the Applicant mark on and/or in association with the Applicant goods and services.

In addition to the documents listed above, the Applicant believes that documents in the possession, custody or control of the Opposer, its attorneys and/or third parties may be relevant to the facts and issues in this proceeding and the Applicant may rely on such documents in support of its claims.

Any confidential documents will be provided subject to the provisions of the standard TTAB Protective Order as may be modified by mutual agreement of the parties.

Dated this \_\_10th\_\_ day of October, 2014



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Signed  
Alexander Wolfe  
1180 Avenue of the Americas, Suite 820  
New York, NY 10036 USA

Applicant

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October, 2014, the foregoing Applicant's **INITIAL DISCLOSURES** was served upon **OPPOSER** via electronic mail, with consent:

Kevin S. Costanza    kevinC@SeedIP.com

By:

A handwritten signature in black ink, appearing to read 'AW', is written above a horizontal line.

Signed  
Alexander Wolfe  
1180 Avenue of the Americas, Suite 820  
New York, NY 10036 USA

Applicant