

ESTTA Tracking number: **ESTTA686136**

Filing date: **07/28/2015**

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

Proceeding	91218304
Party	Plaintiff Kosan Kozmetik Sanayi Ve Ticaret Anonim Sirketi
Correspondence Address	P JAY HINES MUNCY GEISSLER OLDS & LOWE PC 4000 LEGATO RD, STE 310 FAIRFAX, VA 22033 UNITED STATES mailroom@mg-ip.com
Submission	Plaintiff's Notice of Taking Testimony
Filer's Name	P. Jay Hines
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Signature	/pjh/
Date	07/28/2015
Attachments	2015-07-28 Notice of Taking of Deposition Upon Written Questions.pdf(151454 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

TRADEMARK TRIAL AND APPEAL BOARD

KOSANKOZMETIK SANAYI VE TICARET  
ANONIM SIRKETI,

OPPOSER,

v.

MIRJAM ASAM, MARCUS ASAM, and  
AXEL RUTH

APPLICANTS

Opp. No. 91218304

Application Serial No.: 86080166

Mark: FLORA MARE & Design

**NOTICE OF TAKING OF DEPOSITION UPON WRITTEN QUESTIONS**

PLEASE TAKE NOTICE that pursuant to Trademark Rule 2.124 Opposer, Kosan Kozmetik Sanayi ve Ticaret Anonim Sirketi (KOSAN), will take the deposition by written questions of Begüm Özdamar, Legal Counsel, Kosan Kozmetik San. ve Tic. A.S., GOSB Ihsan Dede Cd. No. 133, 41480 Gebze, Kocaeli, Turkey, before a Turkish Court Reporter who is a person before whom depositions may be taken as provided by Rule 28 of the Federal Rules of Civil Procedure.

The witness will testify with regard to each of the following categories of information:

- A. History of KOSAN;
- B. Nature of KOSAN's business;
- C. Documents related to the proof of use of the KOSAN mark FLORMAR in the United States since at least as early as 2012;
- D. Registrations and Applications for the FLORMAR marks;
- E. Website screen shots and information regarding the website

www.flormar.com;

- F. Promotion and marketing strategies;
- G. Advertising and marketing undertaken to promote the FLORMAR mark;
- H. Sales operations including advertising relationships;
- I. Sales and advertising figures and brand recognition;
- J. Applicants' discovery responses, including its answers to interrogatories, requests for admissions and document production in the above-captioned opposition proceeding.

The written questions are served on counsel for the Applicant, but not the Board.

Opposer requests that the Board suspend or reschedule other proceedings in the matter to allow for the orderly completion of the deposition upon written question pursuant to Trademark Rule 2.124(d)(2).

RESPECTFULLY SUBMITTED,  
THE OPPOSER  
Kosan Kozmetik Sanayi Ve Ticaret Anonim Sirketi

Dated: July 28, 2015

By:   
P. Jay Hines

Muncy, Geissler, Olds and Lowe, P.C.  
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CERTIFICATE OF SERVICE

I certify that the foregoing NOTICE OF TAKING OF DEPOSITION UPON WRITTEN QUESTIONS is being sent via first class mail to:

William C. Wright  
Jason M. Drangel  
Robert L. Epstein  
Epstein Drangel LLP  
60 East 42<sup>nd</sup> Street, Suite 2410  
New York, New York 10165

This 28th day of July, 2015.



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Akiyo Yoshida