

ESTTA Tracking number: **ESTTA673754**

Filing date: **05/22/2015**

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

Proceeding	91220325
Party	Plaintiff Micro Matic USA, Inc. and Micro Matic USA, LLC
Correspondence Address	RYAN M CORBETT BURR & FORMAN LLP 201 NORTH FRANKLIN STREET, SUITE 3200 TAMPA, FL 33602 UNITED STATES rcorbett@burr.com
Submission	Motion to Compel Discovery
Filer's Name	Ryan M. Corbett
Filer's e-mail	rcorbett@burr.com
Signature	/Ryan M. Corbett/
Date	05/22/2015
Attachments	Opposers' Motion to Compel Initial Disclosures.pdf(120061 bytes ) Ex. A - Corbett Declaration.pdf(329990 bytes )

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

<b>MICRO MATIC USA, INC. and MICRO MATIC USA, LLC,</b>	)	
	)	
<b>Opposers,</b>	)	<b>Opposition No. 91220325</b>
	)	
<b>v.</b>	)	
	)	
<b>TAIZHOU TALOS SANITARY CO., LTD.,</b>	)	<b>Serial No.: 79148013</b>
	)	
<b>Applicant.</b>		

**OPPOSERS' MOTION TO COMPEL  
APPLICANT TO SERVE INITIAL DISCLOSURES**

Pursuant to Rule 2.120(e)(1) of the Trademark Rules of Practice, Opposers, Micro Matic USA, Inc. and Micro Matic USA, LLC (“Opposers”), by counsel, request that the Board issue an order compelling Applicant, Taizhou Talos Sanitary Co., Ltd. (“Talos” or “Applicant”), to provide its Initial Disclosures as required by the Board’s order instituting the present Opposition. Pursuant to Trademark Rule 2.120(e)(1), Opposers state that Opposers’ counsel attempted to contact Applicant’s counsel multiple times to resolve the dispute that is the subject of the present motion, but has not received a response from Applicant’s counsel.

**I. BACKGROUND**

On January 8, 2015, Opposers filed their Notice of Opposition opposing the registration of Applicant’s applied-for mark MICRO MATIC, Serial No. 79/148,013. On January 22, 2015, the Board issued an order instituting the present Opposition and setting forth various due dates for the proceeding. According to the Board’s schedule, the parties were required to conduct the

discovery conference by April 2, 2015, and exchange initial disclosures by May 2, 2015.<sup>1</sup> Opposers served their initial disclosures on May 4, 2015, in accordance with the Board's schedule.<sup>2</sup> However, Applicant did not, and still has not, served its initial disclosures. Counsel for Opposers emailed Applicant's counsel, Damon Smith, on May 5, 2015 and again on May 14, 2015 at the email address provided in Applicant's Change of Correspondence filed in this proceeding, requesting that Applicant's serve its initial disclosures. Applicant's counsel has not responded.

## II. ARGUMENT

In 2007, the Trademark Rules of Practice were amended to include the exchange of initial disclosures. *See Notice of Final Rulemaking, Miscellaneous Changes to Trademark Trial and Appeal Board Rules*, 72 Fed. Reg. 42242 (Aug. 1, 2007). Exchanging initial disclosures “facilitates the exchange of ‘core information regarding the existence of and location of witnesses and documents,’ lessens the expense of traditional discovery, and promotes early communication toward possible settlement.” *Kairos Inst. of Sound Healing LLC v. Doolittle Gardens, LLC*, Opposition No. 91181945, 2008 WL 4639567, at \*2 (T.T.A.B. Oct. 17, 2008). As the Board has noted, the exchange of initial disclosures is “integral to the efficient conduct of Board proceedings and not an obligation to be taken lightly by the parties.” *Id.* To this end, the Trademark Rules of Practice further specify that “[t]he Board will specify the . . . deadlines within the discovery period for making initial disclosures.” 37 C.F.R. § 2.120(a). When a party

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<sup>1</sup> Although this Motion relates only to Applicant's initial disclosures, Opposers note that Applicant failed to engage in the discovery conference by the required due date despite repeated attempts by Opposers' counsel to contact Applicant's counsel. To date, the discovery conference has not taken place, and Applicant's counsel continues to ignore Opposers' counsel's attempts to make contact.

<sup>2</sup> The May 2, 2015 due date for serving initial disclosures fell on a Saturday, so Opposers timely served their initial disclosures on the next business day, May 4, 2015. *See* 37 C.F.R. § 2.196.

fails to make the required initial disclosures, “a motion to compel initial disclosures is the available remedy.” *Xoom Corp. v. Zoom Tan, LLC*, Opposition No. 91208416, 2015 WL 576713, at \*2 (T.T.A.B. Jan. 22, 2015); 37. C.F.R. § 2.120(e)(1); *Kairos*, 2008 WL 4639567, at \*2.

Applicant’s failure to serve initial disclosures is just latest example of Applicant’s failure to meet its discovery obligations. Although not the subject of this motion, Applicant’s counsel failed to respond to Opposers’ counsel’s emails to schedule the discovery conference required by the Board’s schedule to occur by April 2, 2015. Counsel for Opposers emailed Applicant’s counsel on March 27 and March 31, and left a voicemail with Applicant’s counsel on April 2 attempting to schedule the discovery conference, but never received a response to any email or voicemail. *See* Ex. A (Declaration of Ryan M. Corbett; “Corbett Decl.”) at ¶¶ 2-3. On April 13, 2015, Opposers’ counsel again emailed Applicant’s counsel in an effort to schedule the discovery conference, but again received no response. *See* Ex. A (Corbett Decl.) at ¶ 4.

On May 4, 2015, the due date for exchanging initial disclosures, Opposers served their initial disclosures on Applicant’s counsel. *See* Ex. A (Corbett Decl.) at ¶ 5. Despite receiving Opposers’ initial disclosures more than two weeks ago, Applicant still has not served its initial disclosures. *See Dating DNA, LLC v. Imagini Holdings, Ltd.*, Opposition No. 91191912, 2010 WL 1822098, at \*3 (T.T.A.B. Feb. 22, 2010) (noting that after receiving Applicant’s initial disclosures, “Opposer should have realized it might have a parallel obligation to send its own Initial Disclosures.”); Ex. A (Corbett Decl.) at ¶ 6. Opposers’ counsel emailed Applicant’s counsel on May 5 and again on May 14 demanding that Applicant serve its initial disclosures, but Applicant’s counsel has not responded. *See* Ex. A (Corbett Decl.) at ¶ 7.

Applicant's failure to participate in the required discovery conference and refusal to provide initial disclosures inhibits Opposers' ability to conduct discovery in this proceeding and exhibits a complete disregard for the Board's schedule. Accordingly, Opposers respectfully request that the Board enter an order compelling Applicant to provide its initial disclosures. *See Influence, Inc. v. Elaina Zuker*, Influence, Inc., 2008 WL 4922489 (T.T.A.B. Nov. 13, 2008) (granting motion to compel initial disclosures where Applicant failed to serve initial disclosures by the designated due date).

Respectfully submitted,

/Ryan M. Corbett/

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India E. Vincent  
BURR & FORMAN LLP  
420 North 20th Street  
Suite 3400  
Birmingham, Alabama 35203  
(205) 458-5284

Ryan M. Corbett  
BURR & FORMAN LLP  
201 North Franklin Street  
Suite 3200  
Tampa, Florida 33602  
(813) 367-5740

*Attorneys for Opposers*

Date: May 22, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Opposers' Motion to Compel Applicant to Serve Initial Disclosures has been served on the following by electronic mail on this the 22nd day of May, 2015:

Damon Smith  
1 Yonge Street, Suite 1801  
Toronto, Ontario, M5E 1W7  
Email: us@globalipservice.com

/Ryan M. Corbett/  
Ryan M. Corbett  
BURR & FORMAN LLP  
201 North Franklin Street  
Suite 3200  
Tampa, Florida 33602  
(813) 367-5740

*Attorney for Opposers*

# **EXHIBIT A**

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

<b>MICRO MATIC USA, INC. and MICRO MATIC USA, LLC,</b>	)	
	)	
<b>Opposers,</b>	)	<b>Opposition No. 91220325</b>
	)	
<b>v.</b>	)	
	)	
<b>TAIZHOU TALOS SANITARY CO., LTD.,</b>	)	<b>Serial No.: 79148013</b>
	)	
<b>Applicant.</b>		

**DECLARATION OF RYAN M. CORBETT IN SUPPORT OF OPPOSERS' MOTION TO  
COMPEL APPLICANT TO SERVE INITIAL DISCLOSURES**

I Ryan M. Corbett, hereby declare:

1. I am an attorney in the law firm of Burr & Forman LLP, counsel for Opposers Micro Matic USA, Inc. and Micro Matic USA, LLC (“Opposers”). I submit this declaration in support of Opposers’ Motion to Compel Applicant to Serve Initial Disclosures. I have personal knowledge of the facts set forth in this declaration, and if called upon as a witness, I could and would testify to such facts under oath.

2. Attached hereto as Exhibit 1 to this declaration is a true and correct copy of a March 27, 2015 email and a March 31, 2015 email I sent to Applicant’s counsel, Mr. Damon Smith, requesting Mr. Smith’s availability to conduct the discovery conference required by the Board’s order instituting the above-referenced Opposition proceeding. Mr. Smith did not respond to the March 27 or March 31 email.

3. After not receiving a response to my March 27 and March 31 emails, I left Mr. Smith a voicemail on April 2, 2015 requesting his availability to conduct the discovery conference. Mr. Smith did not respond to my April 2 voicemail.

4. Attached hereto as Exhibit 2 to this declaration is a true and correct copy of an April 13, 2015 email I sent to Mr. Smith again requesting to conduct the required discovery conference. Mr. Smith did not respond to my April 13 email.

5. Attached hereto as Exhibit 3 to this declaration is a true and correct copy of Opposers' Initial Disclosures, and the email dated May 4, 2015 serving Opposers' Initial Disclosures on Applicant's counsel.

6. Opposers have not received Applicant's Initial Disclosures.

7. Attached hereto as Exhibit 4 is a true and correct copy of a May 5, 2015 email and May 14, 2015 email I sent to Mr. Smith requesting that Applicant serve its Initial Disclosures. Mr. Smith has not responded to the May 5 or May 14 email.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is, to the best of my personal knowledge, true and correct.

Dated: May 22, 2015

/Ryan M. Corbett/

\_\_\_\_\_  
Ryan M. Corbett

# **EXHIBIT 1**

## Corbett, Ryan

---

**From:** Corbett, Ryan  
**Sent:** Friday, March 27, 2015 3:27 PM  
**To:** USA Office  
**Subject:** RE: Answer to Opposition No.91220325

Dear Damon:

As you may know, the TTAB's scheduling order requires us to conduct a discovery conference by next Thursday, April 2. Please let me know your availability next week to conduct the discovery conference.

Regards,  
Ryan



Ryan M. Corbett • *Attorney at Law*

---

Suite 3200 • 201 North Franklin Street • Tampa, Florida 33602

direct 813-367-5740 • fax 813-221-7335 • main 813-221-2626

[rcorbett@burr.com](mailto:rcorbett@burr.com) • [www.burr.com](http://www.burr.com)

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**From:** USA Office [<mailto:us@globalipservice.com>]  
**Sent:** Saturday, February 28, 2015 2:49 AM  
**To:** Corbett, Ryan  
**Subject:** RE: Answer to Opposition No.91220325

Dear Ryan

Please be advised that we have submitted the change of correspondence address and answer which you could find the attached documents.

Best Regards

Damon Smith

1 Yonge Street, Suite 1801,

Toronto, Ontario, M5E 1W7

Fax:1-416-352-7569 Email:[us@globalipservice.com](mailto:us@globalipservice.com)

## Corbett, Ryan

---

**From:** Corbett, Ryan  
**Sent:** Tuesday, March 31, 2015 9:52 AM  
**To:** USA Office  
**Subject:** RE: Answer to Opposition No.91220325

Dear Damon:

Please let me know as soon as possible when you are available to conduct the discovery conference before this Thursday's deadline.

Regards,  
Ryan

---

**From:** Corbett, Ryan  
**Sent:** Friday, March 27, 2015 3:27 PM  
**To:** USA Office  
**Subject:** RE: Answer to Opposition No.91220325

Dear Damon:

As you may know, the TTAB's scheduling order requires us to conduct a discovery conference by next Thursday, April 2. Please let me know your availability next week to conduct the discovery conference.

Regards,  
Ryan



Ryan M. Corbett • *Attorney at Law*

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**To:** Corbett, Ryan  
**Subject:** RE: Answer to Opposition No.91220325

Dear Ryan

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Best Regards

Damon Smith

1 Yonge Street, Suite 1801,

Toronto, Ontario, M5E 1W7

Fax:1-416-352-7569 Email:us@globalipservice.com

## **EXHIBIT 2**

## Corbett, Ryan

---

**From:** Corbett, Ryan  
**Sent:** Monday, April 13, 2015 11:38 AM  
**To:** USA Office  
**Subject:** RE: Answer to Opposition No.91220325

Damon:

Please let me know as soon as possible when you are able to conduct the discovery conference in connection with the above-reference Opposition. The Board's deadline for conducting the conference was April 2.

Regards,  
Ryan

---

**From:** Corbett, Ryan  
**Sent:** Tuesday, March 31, 2015 9:52 AM  
**To:** USA Office  
**Subject:** RE: Answer to Opposition No.91220325

Dear Damon:

Please let me know as soon as possible when you are available to conduct the discovery conference before this Thursday's deadline.

Regards,  
Ryan

---

**From:** Corbett, Ryan  
**Sent:** Friday, March 27, 2015 3:27 PM  
**To:** USA Office  
**Subject:** RE: Answer to Opposition No.91220325

Dear Damon:

As you may know, the TTAB's scheduling order requires us to conduct a discovery conference by next Thursday, April 2. Please let me know your availability next week to conduct the discovery conference.

Regards,  
Ryan



Ryan M. Corbett • *Attorney at Law*

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**To:** Corbett, Ryan  
**Subject:** RE: Answer to Opposition No.91220325

Dear Ryan

Please be advised that we have submitted the change of correspondence address and answer which you could find the attached documents.

Best Regards

Damon Smith

1 Yonge Street, Suite 1801,

Toronto, Ontario, M5E 1W7

Fax:1-416-352-7569 Email:[us@globalipservice.com](mailto:us@globalipservice.com)

## **EXHIBIT 3**

## Corbett, Ryan

---

**From:** Corbett, Ryan  
**Sent:** Monday, May 04, 2015 4:47 PM  
**To:** USA Office  
**Subject:** Opposition No. 9120325 - Opposers' Initial Disclosures  
**Attachments:** Opposers' Intial Disclosures.pdf

Dear Damon:

Please find attached Opposers' Initial Disclosures.

Regards,



Ryan M. Corbett • *Attorney at Law*

---

Suite 3200 • 201 North Franklin Street • Tampa, Florida 33602

direct 813-367-5740 • fax 813-221-7335 • main 813-221-2626

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

**In the matter of Application Serial No. 79/148,013  
Filed on April 11, 2014**

**Published in Official Gazette on December 9, 2014  
Mark: MICRO MATIC  
(International Class 007)**

<b>MICRO MATIC USA, INC.,</b>	)	
<b>MICRO MATIC USA, LLC,</b>	)	
	)	
<b>Opposers,</b>	)	
	)	<b>Opposition No. 9120325</b>
<b>v.</b>	)	
	)	
<b>TAIZHOU TALOS SANITARY CO.,</b>	)	
<b>LTD.,</b>	)	
	)	
<b>Applicant.</b>	)	

**OPPOSERS' INITIAL DISCLOSURES**

Micro Matic USA, Inc. and Micro Matic USA, LLC (collectively, "Micro Matic" or "Opposers"), by and through its attorneys, hereby submits their initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and 37 C.F.R. Part 2 § 2.120(a)(3).

**Preliminary Statement**

Opposers have made diligent efforts to identify information and documents in their possession, custody and control that are within the categories of information and documents set forth in Rule 26(a)(1). These initial disclosures represent Opposers' good faith effort, without the benefit of discovery, to comply with Rule 26(a)(1) and 37 C.F.R. Part 2 § 2.120(a)(3). They are not intended to be, and should not be construed as, Opposers' opinion or belief as to whether any witnesses identified actually have discoverable information that Opposers may use to support their claims or defenses in the case. If additional documents or witnesses are revealed

through discovery, Opposers will identify the same pursuant to the applicable provisions of the Federal Rules of Civil Procedure and U.S. Trademark Law Rules of Practice.

The production of these initial disclosures does not constitute a waiver of any objections Opposers may have, now or in the future, to any discovery in this action. Opposers expressly reserve any and all objections that it has or may have, including objections based on the following grounds: Attorney-Client Privilege; Work Product Immunity; any other applicable privilege or immunity based on federal or state law; relevance; competency; hearsay; materiality; vagueness or over breadth of discovery requests; and undue burden or harassment.

Opposers expressly reserve the right to identify or call as witnesses other individuals in addition to those identified herein, and to identify additional documents, electronically stored information, and/or tangible things, if it discovers that such individuals have or might have knowledge of matters relevant to this action or that such additional documents, electronically stored information, and/or tangible things are relevant to this action. Opposers also expressly reserve the right to identify or call expert witnesses in accordance with Federal Rule of Civil Procedure 26(a)(2) and the scheduling order entered in this action.

### **Disclosures**

- (i) The name, and if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information-that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**

Opposers believe that the individuals listed below may have discoverable information that Opposers may use to support their claims. The listing of an individual's name below does not in any way imply consent by Opposers to *ex parte* contact of any witness by opposing counsel whom opposing counsel would not be entitled to contact under the applicable procedural Rules and the Rules of Professional Conduct. The following individuals are employees of Micro

Matic USA, Inc., Micro Matic USA LLC, or their parents, subsidiaries, or affiliates, and may be contacted through counsel: Ryan M. Corbett, Burr & Forman LLP, One Tampa City Center, Suite 3200, 201 North Franklin Street, Tampa, FL 33602, (813) 221-2626.

Name	Subject Matter
Torben Toftegaard President Micro Matic USA	Opposers' use of Micro Matic mark; likelihood of confusion created by Applicant's use of Micro Matic mark.
Peter Muzzonigro Chairman Micro Matic USA	Opposers' use of Micro Matic mark; likelihood of confusion created by Applicant's use of Micro Matic mark.
Brian Van Holten Creative Brands Manager Micro Matic USA	Opposers' use of Micro Matic mark; likelihood of confusion created by Applicant's use of Micro Matic mark.

The following additional people may have knowledge of relevant facts. Current address and telephone number for each of these individuals may not be available to Opposers.

Name	Subject Matter
Those individuals identified in the initial disclosures of Applicant	See descriptions in Applicant's initial disclosures

The aforementioned witnesses are those that are presently known to Opposers based upon a reasonable investigation. Opposers may also retain one or more expert witnesses to testify in support of their claims. Opposers reserve the right to supplement and/or amend this list pursuant to the Federal Rules of Civil Procedure and U.S. Trademark Law Rules of Practice should it become aware of additional individuals likely to have discoverable information. Opposers take no position as to whether any named individual should be deposed and expressly reserves the right to object to the depositions of such persons.

- (ii) **description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in its**

**possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;**

Based on the information reasonably available to Opposers at this time, Opposers describe by category and location the following documents, electronically stored information, and tangible things in their possession, custody, or control that may be used to support their claims or defenses (excluding documents that may be used solely for impeachment). Opposers do not have non-custodial data sources that contain non-duplicative information than those that would be available through counsel and/or the individuals identified above.

The categories of documents, electronically stored information, and tangible things described below are located at the office of Burr & Forman LLP, One Tampa City Center, Suite 3200, 201 North Franklin Street, Tampa, FL 33602 or the offices of Micro Matic USA Inc., 3268 Simon Ct. Brooksville, Florida 34604, and will be made available for inspection and copying at a mutually agreeable time and place.

1. Opposers' Organizational Documents;
2. Invoices and/or Purchase Orders illustrating sales of Opposers' goods and services to Opposers' customers throughout the United States,
3. Communications relating to Opposers' Website;
4. Printouts from Opposers' website showing Opposers' online use of its trademarks in conjunction with its goods and services;
5. Documents showing expenditures for marketing and advertising;
6. Marketing and advertising materials, including, but not limited to labels and boxes from Opposers' goods; and
7. Communications between Opposer and the United States Patent and Trademark Office.

- (iii) **computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and,**

Opposers are not seeking damages in this proceeding, and therefore this section is not applicable.

- (iv) **for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment**

Opposers maintain no insurance agreements applicable to this action.

Respectfully submitted,

/Ryan M. Corbett/

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India E. Vincent  
BURR & FORMAN LLP  
420 North 20th Street  
Suite 3400  
Birmingham, Alabama 35203  
(205) 458-5284

Ryan M. Corbett  
BURR & FORMAN LLP  
201 North Franklin Street  
Suite 3200  
Tampa, Florida 33602  
(813) 367-5740

*Attorneys for Opposers*

Date: May 4, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing Opposers' Initial Disclosures on the attorney of record for the Applicant by delivering a copy of same via electronic mail on May 4, 2015, to the following individuals:

Damon Smith  
1 Yonge Street, Suite 1801  
Toronto, Ontario, M5E 1W7  
[us@globalipservice.com](mailto:us@globalipservice.com)

/Ryan M. Corbett/  
Ryan M. Corbett  
Burr & Forman LLP  
201 North Franklin Street  
Suite 3200  
Tampa, Florida 33602  
(813) 367-5740

*Attorney for Opposers*

# **EXHIBIT 4**

## Corbett, Ryan

---

**From:** Corbett, Ryan  
**Sent:** Tuesday, May 05, 2015 6:22 PM  
**To:** USA Office  
**Subject:** RE: Opposition No. 9120325 - Opposers' Initial Disclosures

Dear Damon:

We did not receive your initial disclosures by yesterday's due date. Please let me know when we can expect to receive them or we will be forced to seek the Board's assistance.

Regards,

Ryan

---

**From:** Corbett, Ryan  
**Sent:** Monday, May 04, 2015 4:47 PM  
**To:** USA Office  
**Subject:** Opposition No. 9120325 - Opposers' Initial Disclosures

Dear Damon:

Please find attached Opposers' Initial Disclosures.

Regards,



Ryan M. Corbett • *Attorney at Law*

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## Corbett, Ryan

---

**From:** Corbett, Ryan  
**Sent:** Thursday, May 14, 2015 1:40 PM  
**To:** USA Office  
**Subject:** RE: Opposition No. 9120325 - Opposers' Initial Disclosures

Damon:

I have attempted to reach you multiple times via email and phone to conduct the discovery conference, and regarding your failure to timely serve Applicant's initial disclosures, but I have not received a response. Please serve Applicant's initial disclosures immediately or we will file a motion to compel such disclosure.

Regards,

Ryan

---

**From:** Corbett, Ryan  
**Sent:** Tuesday, May 05, 2015 6:22 PM  
**To:** USA Office  
**Subject:** RE: Opposition No. 9120325 - Opposers' Initial Disclosures

Dear Damon:

We did not receive your initial disclosures by yesterday's due date. Please let me know when we can expect to receive them or we will be forced to seek the Board's assistance.

Regards,

Ryan

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**From:** Corbett, Ryan  
**Sent:** Monday, May 04, 2015 4:47 PM  
**To:** USA Office  
**Subject:** Opposition No. 9120325 - Opposers' Initial Disclosures

Dear Damon:

Please find attached Opposers' Initial Disclosures.

Regards,



Ryan M. Corbett • *Attorney at Law*

---

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