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

Proceeding	91222999
Party	Defendant Videokall Inc.
Correspondence Address	VIDEOKALL INC 10631 BARN WOOD LN POTOMAC, MD 20854-1325 UNITED STATES cnahabed@gmail.com
Submission	Testimony For Defendant
Filer's Name	Charles Nahabedian
Filer's e-mail	c.nahabedian@medexspot.com
Signature	/Charles E Nahabedian/
Date	06/30/2016
Attachments	2-Response to Interrogatories.pdf(305309 bytes) 3-APPLICANT Response for producing docs.pdf(788372 bytes)

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

In the Matter of Application Serial No. 86/414,664
Published in the Official Gazette of March 31, 2015

URGENT CARE MSO, LLC,
Opposer,
v.
VIDEOKALL, INC.,
Applicant.

Opposition No. 91222999

APPLICANT'S RESPONSES TO OPPOSER'S FIRST SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, Applicant Videokall, Inc hereby propounds its first set of written Responses to Interrogatories by the Opposer Urgent Care MSO, LLC. These Interrogatories are being answered separately and fully, in writing under oath, within 30 days of the date of their service.

DEFINITIONS

For purposes of these Interrogatories:

1. "Opposer" means the Opposer in this proceeding, Urgent Care MSO, LLC.
2. "Applicant" means the Applicant in this proceeding, Videokall, Inc.
3. "Opposed Application" means Application Serial No. 86/414,664, the application at issue in this proceeding.
4. "Applicant's Mark" means the mark shown in the Opposed Application.
5. "Opposer's Marks" refers to the following marks collectively: MEDEXPRESS (U.S. Reg. No. 3,311,726); MEDEXPRESS CORPORATE CARE (U.S. Reg. No. 3,205,430); MEDEXPRESS & Design (U.S. Reg. No. 3,519,373); MEDEXPRESS & Design (U.S. Reg. No. 3,733,948); and ME MEDEXPRESS & Design (U.S. Reg. No. 4,417,150).

RESPONSES TO INTERROGATORIES

RESPONSE TO INTERROGATORY NO. 1:

Vincent Waterson, Acting Chairman and VP of Branding, P.O. Box 60841, Potomac, MD 20859
Home Address is in Ventura, CA

Charles Nahabedian, President and CEO, P.O. Box 60841, Potomac, MD 20859
Home Address is in Bethesda, MD

RESPONSE TO INTERROGATORY NO. 2:

MEDEX, which is not in the dictionary, is a variant on FEDEX; and SPOT is for a specific location such as “Hot Spot”.

RESPONSE TO INTERROGATORY NO. 3:

No other names or marks were considered for a trademark.

RESPONSE TO INTERROGATORY NO. 4:

An online trademark search was conducted by Applicant in connection with the selection and application for registration of Applicant’s Mark. The sites for the search included:

- a. The USPTO trademark database, the results have been submitted to the USPTO in APPLICANT’S previous filings.
- b. The search was conducted by Vince Waterson
- c. References and results have been submitted to the USPTO in APPLICANT’S previous filings

RESPONSE TO INTERROGATORY NO. 5:

Applicant first became aware of Opposer name on or about January 2013 and Opposer’s marks upon its filing its Opposition.

RESPONSE TO INTERROGATORY NO. 6:

Applicant first became aware of Opposer name on or about January 2013, and Opposer Marks upon its filing its Opposition.

RESPONSE TO INTERROGATORY NO. 7:

Applicant will market or promote its products and services to hospitals that will be providing the medical services, and the retail and other locations hosting its unmanned micro-cabins. Applicant will further advertise and promote its services to potential patients in cooperation with the medical service providers and the cabin-hosting entities. The services to the patient are confined to advice, triage, assessment and referral or treatment. Treatment is for services limited by the licenses of the Nurse Practitioners employed by the medical provider, and do not include more complex services and prescriptions requiring a physician, medical personnel, and/or medical equipment normally found in urgent care centers, such as represented by the Opposer.

RESPONSE TO INTERROGATORY NO. 8:

The specific prices of the goods and services identified in the Opposed Application that Applicant plans to sell under Applicant’s Mark are COMPANY PRIVATE at this time, and will be precisely determined by the medical service provider for a group of micro-cabins it supports. However, the price to the patient for the services provided by the hospital is expected to be approximately one-half of what a manned clinic charges and approximately one-third of what an Urgent Care center, as represented by the OPPOSER, charges. The hospital, in conjunction with the unmanned cabin provided by the Applicant, provides a small subset of the services of the

OPPOSER, and does so with the patient using the self-service devices. OPPOSER'S services presumably are NOT self-service.

RESPONSE TO INTERROGATORY NO. 9:

The APPLICANT has used its Mark in proposals to B2B prospective customers, strategic partners, investors, vendors, accelerators, incubators, State agencies, commerce organizations, suppliers and website since 2/19/2010. The traffic on the website varies day-to-day but averages approximately 10 per day.

RESPONSE TO INTERROGATORY NO. 10:

The general channels of trade in which, and the classes of customers to whom, Applicant has marketed and/or sold the goods and services identified in the Opposed Application under Applicant's Mark include supermarket chains, hospital and medical systems, clinics and ACOs, NGOs, distributors, insurance and related healthcare providers, drugstore chains and corporate work locations.

RESPONSE TO INTERROGATORY NO. 11:

No person has expressed the belief, orally, in writing, or by conduct, that Applicant's Mark is similar to Opposer's Marks except for the OPPOSER.

RESPONSE TO INTERROGATORY NO. 12:

No person has expressed the belief, orally, in writing, or by conduct, that Applicant's Mark reminded the person of one or more of Opposer's Marks, except for the OPPOSER.

RESPONSE TO INTERROGATORY NO. 13:

There have not been any consumer research, market research, focus groups, studies, or other forms of research of which Applicant is aware regarding Applicant's Mark.

RESPONSE TO INTERROGATORY NO. 14:

The development of any advertising and promotional materials bearing Applicant's Mark has been by the two principals noted above in **RESPONSE No. 1**, and the development as noted in **RESPONSE No. 2**.

RESPONSE TO INTERROGATORY NO. 15:

The agent, sales representative, distributor, wholesale outlet and/or retail outlet in the United States and internationally through which Applicant will sell, sells or has sold goods and services in connection with Applicant's Mark is COMPANY PRIVATE.

RESPONSE TO INTERROGATORY NO. 16:

The APPLICANT has stated all facts that support Applicant's response for Admissions in all of its previous filings, including this filing, and the **NOTICE OF OPPOSITION BY APPLICANT**, dated October 27, 2015.

RESPONSE TO INTERROGATORY NO. 17:

The persons who supplied information for or participated in responding to these Interrogatories, Opposer's First Set of Request for Production of Documents and Things to Applicant, and

Opposer's First Set of Requests for Admission to Applicant has been by the two principals noted above in **RESPONSE No. 1**.

Date: June 30, 2016

Regards,



Charles E. Nahabedian
CEO, Medex Spot
P.O. Box 60841
Potomac, MD 20859
B: 805 -233 -7844
C: 201 -704 - 0730
www.medexspot.com
c.nahabedian@medexspot.com

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2016, I served the foregoing "APPLICANT'S REAPONSES TO OPPOSER'S FIRST SET OF INTERROGATORIES" by depositing a true copy thereof in a sealed envelope, postage prepaid, in First Class U.S. mail addressed as follows:

Ms. Lauren M. Gregory
Seyfarth Shaw, LLP.
1075 Peachtree Street, N.E.
Suite 2500
Atlanta, GA 30309-3958



Charles E. Nahabedian

APPLICANT'S RESPONSE TO OPPOSER'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, Applicant responds to Opposer's, Urgent Care MSO, LLC request that Applicant VideoKall, Inc. produce for Opposer's inspection and copying the documents and things requested below, at 10 a.m. on June 30, 2016, at the offices of Seyfarth Shaw LLP, 1075 Peachtree St. NE, Suite 2500, Atlanta, Georgia 30309, or at such other time and place, or by such other means, as the parties may agree, and that Applicant serve a written response to these Requests within 30 days of service.

DEFINITIONS

For purposes of these requests:

1. "Opposer" means the Opposer in this proceeding, Urgent Care MSO, LLC.
2. "Applicant" means the Applicant in this proceeding, VideoKall, Inc.
3. "Opposed Application" means Application Serial No. 86/414,664, the application at issue in this proceeding.
4. "Applicant's Mark" means the mark shown in the Opposed Application.
5. "Opposer's Marks" refers to the following marks collectively: MEDEXPRESS (U.S. Reg. No. 3,311,726); MEDEXPRESS CORPORATE CARE (U.S. Reg. No. 3,205,430); MEDEXPRESS & Design (U.S. Reg. No. 3,519,373); MEDEXPRESS & Design (U.S. Reg. No. 3,733,948); and ME MEDEXPRESS & Design (U.S. Reg. No. 4,417,150).

REQUESTS FOR PRODUCTION

RESPONSE TO REQUEST NO. 1:

VideoKall, Inc. is a bootstrapped start-up which has used its investments to develop a working prototype and has not to date had funds to hire trademark attorneys. The two principals listed in the APPLICANT'S RESPONSE to the FIRST SET OF INTERROGATORIES live and operate in MD and CA, and, therefore, at this time there are no centralized, linked, common or official files. As stated in that response, there were no formal documented studies, other than the list produced by the USPTO listing of like trademarks for MEDEX SPOT, and in that USPTO listing, the OPPOSER'S mark did NOT surface. Therefore, there are no further documents to

produce. That list has been submitted to the USPTO in the **NOTICE OF OPPOSITION BY APPLICANT**, dated October 27, 2015.

RESPONSE TO REQUEST NO. 2:

The goods and services identified in the Opposed Application that will be sold or which will be sold under Applicant's Mark are a micro-cabin to a hospital or host location, a terminal, server and satellite transceiver to a hospital, and telecommunications and support services for connecting and operating the totally integrated system with custom software in both locations. The services sold by the hospital under its name principally, plus the Applicant's name as the enabler, are generally seasonal illness and chronic illness monitoring, examinations and/or treatment. A specific list will be prepared by the hospital for those it wishes to support, and are not available at this time. Therefore, there are no documents to produce.

RESPONSE TO REQUEST NO. 3:

All documents and things relating or referring to, or evidencing, reflecting, or constituting any plans to develop the goods and services identified in the Opposed Application that are sold or which will be sold under Applicant's Mark are COMPANY PRIVATE.

RESPONSE TO REQUEST NO. 4:

All documents and things relating to or referring to, or evidencing, reflecting, or constituting, any sales or promotional materials for any of the goods and services identified in the Opposed Application that are sold or which will be sold under Applicant's Mark, including, without limitation, any catalogs, mailers, point-of-sale materials, promotional literature, brochures, television or radio advertisements, and other materials will be prepared after a customer trial. Therefore, there are no documents to produce at this time. A Preliminary or Draft brochure is provided below.

RESPONSE TO REQUEST NO. 5:

Representative samples of each form of packaging and labeling for each of the goods identified in the Opposed Application that are sold or which will be sold under Applicant's

Mark will be prepared after a customer trial. Therefore, there are no such documents to produce at this time.

RESPONSE TO REQUEST NO. 6:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, Applicant's awareness of Opposer when Applicant adopted Applicant's Mark. There are none. Therefore, there are no documents to produce. The Applicant selected the Mark in January 2010 in the same month that the MEDEX SPOT website was registered to begin its content development. Thereafter, up to the present, Applicant has been using the Mark, MEDEX SPOT. Applicant became aware of MED Express name just before January 2013, when it was mentioned in a slide presentation of example of two urgent care centers in Delaware [See below]. Thereafter, all urgent care centers were considered, together, and more substantially different than the Applicant's plans, designs, markets, and customers.

RESPONSE TO REQUEST NO. 7:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, Applicant's awareness of one or more of Opposer's Marks when Applicant adopted Applicant's Mark. There are none. Therefore, there are no documents to produce.

RESPONSE TO REQUEST NO. 8:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, any actual use or planned use of Applicant's Mark in commerce on or in connection with the goods and services identified in the Opposed Application, or any other goods or services, including, without limitation, all labels, packages, and packaging materials. [See attached]

RESPONSE TO REQUEST NO. 9:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, any correspondence or communication between Applicant and any third party (other than Applicant's counsel) regarding Opposer and/or Opposer's Marks. Other than below, there are no documents to produce.

RESPONSE TO REQUEST NO. 10:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, any correspondence or communication between Applicant and any third party (other than Applicant's counsel) regarding Opposer. [See attached]

RESPONSE TO REQUEST NO. 11:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, any correspondence or communication between Applicant and any third party (other than Applicant's counsel) regarding Opposer's Marks. As there were no comparisons of Marks at the time of Applicant adopting its name and its Mark, there are no documents to produce.

RESPONSE TO REQUEST NO. 12:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, the nature, duration, and/or extent of any actual use in commerce of Applicant's Mark. [See attached]

RESPONSE TO REQUEST NO. 13:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, the identity of the manufacturer(s) of all goods sold under Applicant's Mark. There are no contracts with manufacturers of goods sold under Applicant's Mark. There are over 12 manufacturers of various hardware and software, and telecommunications that will be fully integrated and constitute the final goods to be sold under Applicant's Mark to enable hospitals and the like to provide services in locations of convenience at low costs within the capabilities of the goods sold under the Applicant's Mark and the desires and capabilities of the medical services provider.

RESPONSE TO REQUEST NO. 14:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, any consumer research, market research, focus groups, studies, or other forms of research regarding Applicant's Mark. There has been no such research or studies, because the Applicant's Mark is considered unique, descriptive, and appropriate for the location and confines of Applicant's

micro-cabin, and not in conflict with other Mark's provided by the USPTO list, and now the Opposer's Mark. There are no documents to provide.

RESPONSE TO REQUEST NO. 15:

All documents relating or referring to, or evidencing, reflecting, or constituting, any instance in which any person has expressed the belief, orally, in writing, or by conduct, that Applicant's goods and services that are sold or which will be sold under Applicant's Mark originate or are associated with, or are licensed, sponsored, or authorized by, Opposer. There has been no such documents and therefore there are no documents to provide.

RESPONSE TO REQUEST NO. 16:

All documents relating or referring to, or evidencing, reflecting, or constituting, any instance in which any person has expressed the belief, orally, in writing, or by conduct, that Applicant's Mark is similar to Opposer's Marks, or brings to mind Opposer's Marks. There has been no such documents and, therefore, there are no documents to provide.

RESPONSE TO REQUEST NO. 17:

Documents and things sufficient to show all general channels of trade and classes of customers in the United States for Applicant's goods and services sold or to be sold under Applicant's Mark. [See below]

RESPONSE TO REQUEST NO. 18:

All documents and things relating or referring to, or evidencing, reflecting, or constituting, the opinions of any expert witness that Applicant intends to call at trial. There are none at this time.

RESPONSE TO REQUEST NO. 19:

All documents relating or referring to Opposer. None other than what the Opposer has already provided.

RESPONSE TO REQUEST NO. 20:

All documents relating or referring to Opposer's Marks. None other than what the Opposer has already provided.

Date: June 30, 2016

Regards,



Charles E. Nahabedian
CEO, Medex Spot
P.O. Box 60841
Potomac, MD 20859
B: 805 -233 -7844
C: 201 -704 - 0730
www.medexspot.com
c.nahabedian@medexspot.com

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2016, I served the foregoing "APPLICANT'S REAPONSES TO OPPOSER'S FIRST SET OF INTERROGATORIES" by depositing a true copy thereof in a sealed envelope, postage prepaid, in First Class U.S. mail addressed as follows:

Ms. Lauren M. Gregory
Seyfarth Shaw, LLP.
1075 Peachtree Street, N.E.
Suite 2500
Atlanta, GA 30309-3958



Charles E. Nahabedian

ATTACHMENT FOR RESPONSE TO REQUEST NO. 8: (circa 4/12/10)

MEDEX Spot Brochure Draft Text v1



MEDEX Spot is an entirely new experience in Primary Health Care providing greater convenience and lower cost for regular wellness checks, treatment of minor ailments and consultations with specialists for walk in patients at MEDEX Spot locations in supermarkets and airports.

MEDEX Spot instant telehealth service

In recent years we have seen a move towards self service at gas stations, supermarket checkouts and airport check in thanks to the shrinking cost of new technology. We are VideoKall Inc an innovator in long distance video communications and remote equipment management and we are about to bring the same self service convenience to the healthcare market. Our latest innovation is Medex Spot a new high tech service which enables the public to have access to medical practitioners on demand. VideoKall has developed what is believed to be the world's first Unmanned Micro Clinic. We are bringing to the US healthcare market a self service primary healthcare system which enables members of the public to walk-in to Unmanned Micro Clinics

fitted it out with vital signs monitoring devices which enable the condition of the patient's health to be analyzed and transmitted by satellite to a remote Medical Call Center (MCC) whilst the patient has a two way video call with a medical practitioner at the MCC.

MEDEX Spot Medical Call Centers (MCC) will be located at five general hospitals located across the USA and staffed by Doctors and Nurse Practitioners equipped with VideoKall Telehealth Terminals which allow the medical practitioners to see and talk to the patient over a high resolution videophone link and simultaneously receive their vital signs data including pulse, blood pressure, body temperature, Body Mass Index, glucose, blood oxygen and more. Other services MEDEX Spot plans to provide, along with the MCC's, consultations on pregnancy, erectile dysfunction, anger management and depression plus second opinions on cancer treatment with oncologists on one to one calls.



Patient vital signs transmitted by satellite during video phone call with nurse-practitioner

Unmanned Micro Clinics (UMC) are located in air sanitized and sound absorbed cabins inside supermarkets and airports providing patients with a clean private personal space where they can have a confidential consultation with a medical professional whom they can select by gender and/or by language. Initially the service will provide male and female, English and Spanish speaking medical personnel at MCC's and other language capabilities will be added as the services rolls out across the country.

The MEDEX Spot service is an affordable \$35 for an initial 10 minute consultation with a

hospital based medical professional with any extra time required charged on a per minute basis from a prepaid SMART card purchased and value-added at a service counter in the supermarket. The MEDEX Spot service is priced close to insurance co-pay charges and is a prepaid-only service which does not require nor prohibit use of any medical insurance. Medex Spot does not require patients to show a Social Security number or Medical Insurance card; so it may also be used by overseas visitors and US citizens who do not have insurance or who are insured but are traveling out of state.

At the end of a consultation a patient can expect to either receive a prescription delivered electronically to the pharmacy located in the same supermarket as the UMC or receive a blood test request form electronically onto a SMART card which they can use at participating diagnostics clinics. Patients at airports will be able to receive prescriptions for most major drugs from a state-of-the-art medical prescription vending machine located close to the UMC cabin.



A Telehealth Service developed by VideoKall, Inc using its patent -pending technology.



ATTACHMENT FOR RESPONSE TO REQUEST NO. 10:

(Earliest email)

Charles Nahabedian <cnahabed@gmail.com>

1/14/13

to Patty, Bob, Michael, Ian, Wolfgang, Arnold, Vince Bob, Mike and Patty,

I appreciate Ian bringing us together, and enjoyed our opportunity today to discuss MedexSpot and how our plans would fit in with the strategic direction and plans of Delaware.

The slides used today are attached as a pdf file. Tomorrow, I will send out our PPM. In the coming days, I will share with you more of the patient outcome expectations of our service, and what it might mean for Delaware if we did more in there than had previously been envisioned.

I did get off a brief email to the Governor Markell that we met today. His website/office probably received it in the 4:45pm timeframe. Not sure it is in time for your gathering tonight.

We look forward to exploring various relationships to work together and help Delaware become a leader in the Telehealth field.

Thanks again for your time and interest.

Regards,

Charlie

Charles Nahabedian
CEO, VideoKall, Inc.
HQ: Potomac, MD
C: [201-704-0730](tel:201-704-0730)
ceo@videokall.com
Listed on LinkedIn

www.videokall.com
www.medexspot.com

Attachments area



Competition

- ▶ **Retail clinics still growing**
 - The number of retail clinics grew by 128 from January 2011 (1,227) to January 2012 (1,355).
 - The two chains dominating the market are CVS MinuteClinics and Take Care Clinics, plus much smaller numbers of clinics in 37 other retail chains/locations.
 - Delaware is seeing substantial growth in 'for-profit walk-in clinics' such as *Doctors Express* and *MedExpress*
- ▶ **Newer Entries**
 - On-line chat services
 - SoloHealth
 - TelaDoc

ATTACHMENT FOR RESPONSE TO REQUEST NO. 12: [portions of a letter to
SuperValu. Proprietary portions redacted.]



VideoKall Inc

P.O. Box 1173, Ventura, CA 93007

Phone: 1-805-641-2677 Efax: 1-801-812-8659

Email: info@videokall.com

Mr. XXXXXX
Vice President
Supervalu

3030 Cullerton Drive
Franklin Park,
Illinois 60131
Tel: (847) 916-XXXX
XXXXXXXX@supervalu.com

May 30, 2010

Dear XXXXX,

When I last wrote to you at Christmas I expected to be able to invite you to a demonstration of the VideoKall Telehealth system in February this year. At that time we were relying on third parties to supply the video conference equipment which is a vital part of the satellite telehealth system we now call MEDEX Spot. The vendor we were using could not meet the price point we needed for the equipment of the system. We felt we had no option but to design our own VIDEO CODEC (the digital camera, compression engine and transmission protocol converter). We, along with our partner C21 from the UK, designed this hardware and software from scratch in 4 months and we now have a working model ready to be demonstrated to you and/or your colleagues at **Wenger Corporation factory in Owatonna, MN on Monday thru Wednesday June 7-9 inclusive.**

We will have installed at the Wenger factory a 5ft x 6ft 3ins cabin with built-in sound reduction (for patient privacy), automatic sanitization of air and surfaces system, two-way video conference terminal and vital signs monitoring devices. For this demonstration, the patient will be connected over satellite to a medical practitioner situated in La Habra, CA. and the patient's vital measurements will be relayed for display and analysis by the medical professional.

We have patents pending for the system design and also for a system which will automatically detect if a patient spills food, drink or leaves other trash in the cabin; if cleaning is required, the patient is automatically charged, on the prepaid SMART card, a cleaning fee which is sent electronically to SuperValu to pay for a store assistant to clean the cabin.

Besides the added traffic to the stores, and resulting medical and grocery sales, we project that the assumed arrangement and proposed service will be an ongoing revenue stream for your stores.

VideoKall will XXXXXXXX.

VideoKall proposes XXXXXX. From that fee we would expect SuperValu to spend \$0.43 per call on average to clean the cabin once per day at the end of each day and an average of US\$0.13 for electric power per call. The power cost is calculated on the cabin running in hibernate mode when there is no patient present.

Our plan is to install Unmanned Micro Clinic Cabins at XXX supermarkets in year 1 and an additional XXX cabins in year 2 bringing the total in service to XXXX cabins to provide service for the initial 5 years.

Based on our conservative projections we would expect SuperValu to XXXXX

We believe that seeing the demonstration and SuperValu participation in the planning of a 10-store market trial is critical to a successful full service launch. The cabins are reasonably self-contained except for floor space, power, and cabling to the satellite modem/router. Once the store locations are identified, we will seek hospitals and clinics interested in the medical call center role where appropriate licensed personnel are available for the states involved. The call center and telecommunications facilities will be worked out with the centers and our telecommunications partners as required.

If you are unable to attend I would be grateful if you might suggest personnel from your Chicago office who might attend, also if there are any managers at SuperValu HQ who may be interested in driving over to Owatonna to see the demo they would be most welcome. I would be grateful if you can advise me ASAP which SuperValu personnel are available to attend.

Best regards

Vince Waterson

Chairman

VideoKall Inc

Tel: 805-641-2677

Cell: 808-216-2136

email: chairman@videokall.com

ATTACHMENT FOR RESPONSE TO REQUEST NO. 17:

Points of Convenience for Cabins
Obvious US Market Segments



Plus the Not So Obvious



MEDEX *Spot*
INSTANT TELEHEALTH SERVICE

13

Points of Convenience
Not So Obvious

High Net-Worth Homes
Veterans Administration
Indian Reservations
Oil Fields & Rigs
Corporate & Work Locations

Truck Stops
Airports
Universities
High Schools



MEDEX *Spot*
INSTANT TELEHEALTH SERVICE

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