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Filing date: **03/08/2016**

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

Proceeding	91223262
Party	Defendant Twitter, Inc.
Correspondence Address	JOSEPH PETERSEN KILPATRICK TOWNSEND & STOCKTON LLP 1080 MARSH ROAD MENLO PARK, CA 94025 UNITED STATES JPetersen@kiltown.com, aroach@kiltown.com, cgenteman@kiltown.com, agarcia@kiltown.com, tmadmin@kiltown.com
Submission	Opposition/Response to Motion
Filer's Name	Joseph Petersen
Filer's e-mail	JPetersen@kiltown.com, aroach@kiltown.com, cgenteman@kiltown.com, agarcia@kiltown.com, tmadmin@kiltown.com
Signature	/Joseph Petersen/
Date	03/08/2016
Attachments	Content Guru v. Twitter_ Twitter_s Response to Opposer_s Motion to Quash Notices of Oral Deposition.pdf(11639 bytes)

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

In re Serial No. 86328428
to register: TWEETSTORM
Filed: July 3, 2014
Published: April 14, 2015

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CONTENT GURU LIMITED,	:	
	:	Opposition No. 91223262
Opposer,	:	
	:	
v.	:	
	:	
TWITTER, INC.,	:	
	:	
Applicant.	:	
-----X		

**TWITTER, INC.’S RESPONSE IN OPPOSITION TO
OPPOSER’S MOTION TO QUASH NOTICES OF ORAL DEPOSITION**

Applicant Twitter, Inc. (“Twitter”) hereby opposes the Motion to Quash Notices of Oral Deposition filed by Opposer Content Guru Limited (“Opposer”). As explained in Twitter’s Motion to Take Live Deposition Testimony for Good Cause Shown and Memorandum in Support (Dkt. 15), as well as Twitter’s Reply in Support of its Motion¹ (filed contemporaneously with this Response), Twitter has shown good cause for taking deposition testimony by oral examination of representatives of Opposer upon whom Twitter has served timely deposition notices, namely, Martin Taylor and Opposer’s designated 30(b)(6) witness(es), all of whom are believed to be located in the United Kingdom, and the equities clearly weigh in Twitter’s favor. Accordingly, pursuant to 37 C.F.R. § 2.120(c), the Trademark Trial and Appeal Board should

¹ Twitter hereby expressly incorporates by reference its arguments from its Motion to Take Live Deposition Testimony for Good Cause Shown and Memorandum in Support and its Reply in Support of its Motion.

permit the taking of live depositions of Opposer's representatives by video conference and deny Opposer's motion to quash.

KILPATRICK TOWNSEND &
STOCKTON LLP

Dated: March 8, 2016

By: /s/Joseph Petersen
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Attorneys for Applicant Twitter, Inc.

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	:	
TWITTER, INC.,	:	
	:	
Applicant.	:	
-----X		

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing TWITTER, INC.'S RESPONSE IN OPPOSITION TO OPPOSER'S MOTION TO QUASH NOTICES OF ORAL DEPOSITION has been served on Opposer by depositing said copy with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to:

Janet F. Satterthwaite
Potomac Law Group
1300 Pennsylvania Ave NW
Washington, DC 20004

Dated: March 8, 2016

/s/Alberto Garcia
Alberto Garcia