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

Proceeding	91224067
Party	Plaintiff Larry Paletz
Correspondence Address	LARRY PALETZ 1493 CAMINITO SOLIDAGO LA JOLLA, CA 92037 UNITED STATES lifegoodinca@outlook.com, lpaletz@wellmann.com
Submission	Motion to Compel Discovery
Filer's Name	Larry Paletz
Filer's e-mail	lifegoodinca@outlook.com, lpaletz@wellmann.com
Signature	/larrypaletz/
Date	04/07/2016
Attachments	2016-04-07 MOTION TO COMPEL DISCOVERY.pdf(54662 bytes ) 2016-02-29 PRELIMINARY DEMAND FOR DISCOVERY.pdf(170094 bytes )

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

In the matter of Application Serial Number: 79143534  
Filed: September 11, 2013  
For the mark: Tielsa  
Published in the *Trademark Official Gazette* on May 26, 2015

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**Larry Paletz,**

**Opposer,**

v.

Proceeding Number 91224067

**Tielsa GmbH,**

**Applicant**

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**MOTION TO COMPEL DISCOVERY**

**Whereas** Applicant Tielsa GmbH (“Applicant”) filed an intent-to-use based trademark application on September 11, 2013 seeking to register the proposed Mark **Tielsa** in:

International Class 009

and

International Class 010

and

International Class 011

and

International Class 019

and

International Class 020

and

International Class 038

and

International Class 044

**Whereas** Opposer made a **PRELIMINARY DEMAND FOR DISCOVERY** to Applicant on 2/29/2016,  
a copy of which is attached hereto.

and

**Whereas** Applicant failed to respond.

Opposer makes this MOTION TO COMPEL DISCOVERY.

Dated: February 29, 2016

LARRY PALETZ

/Larry Paletz/

Larry Paletz

1493 Caminito Solidago

La Jolla, CA 92037

858-459-1000 (Telephone)

Lpaletz@wellmann.com (Email)

Opposer

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

In the matter of Application Serial Number: 79143534  
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Larry Paletz

Opposer

v.

Proceeding Number 91224067

Tielsa GmbH,

Applicant

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**CERTIFICATE OF SERVICE BY MAIL**

STATE OF CALIFORNIA     )  
  ) ss.  
COUNTY OF SAN DIEGO    )

Larry Paletz, of the City of La Jolla, County of San Diego, in the State of California, hereby certifies under penalty of perjury of the laws of the State of California, that on the 7<sup>th</sup> day of April 2016, he mailed a true and correct copy of Opposer's:

**MOTION TO COMPEL DISCOVERY**

in the above-captioned action to the last known address, corrected by the United States Postal Service, per First Class Mail and email, 2016, to-wit:

DANIELA FUESSEL  
FUESSEL LAW  
475 Washington Blvd  
Venice, CA 90292-5287  
E-Mail: schiller@f-200.com



.....

April 7, 2016

February 29, 2016

Daniella Füssel  
Füssel Law  
475 Washington Blvd  
Venice, CA 90292-5287

Dear Ms. Füssel,

**RE: UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD  
MARK: TIELSA : PROCEEDING NUMBER 91224067**

Kindly destroy the **PRELIMINARY DEMAND FOR DISCOVERY** dated February 22, 2016, which was incomplete. I have attached a **PRELIMINARY DEMAND FOR DISCOVERY** dated February 29, 2016, which replaces the earlier document.

Very Truly Yours,

gd  
\*Encl

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

In the matter of Application Serial Number: 79143534  
Filed: September 11, 2013  
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**Larry Paletz,**

**Opposer,**

v.

Proceeding Number 91224067

**Tielsa GmbH,**

**Applicant**

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**PRELIMINARY DEMAND FOR DISCOVERY**

**Whereas** Applicant Tielsa GmbH (“Applicant”) filed an intent-to-use based trademark application on September 11, 2013 seeking to register the proposed Mark **Tielsa** in:

International Class 009

and

International Class 010

and

International Class 011

and

International Class 019

and

International Class 020

and

International Class 038

and

International Class 044

**Whereas** the TTAB set a deadline of 1/20/2016 for a Discovery Conference.

and

**Whereas** Opposer repeatedly requested by First-Class Mail, Priority Mail, e-mail and Telephone that Applicant attend a Discovery Conference.

and

**Whereas** Applicant failed to cooperate and did not attend any Discovery Conference.

and

**Whereas** Opposer provided Initial Disclosures as a part of Opposer's **AMENDED NOTICE OF OPPOSITION** which was filed with Applicant's consent with the TTAB on 1/27/2016.

and

**Whereas** Applicant has failed to provide Initial Disclosures.

Opposer makes demand for the following documents and information, all of which are customary in respect of the normal course of business for a Company which manufactures, markets and supports the goods and services referenced in Applicant's Application:

1. In respect of Applicant:
  - a. Complete Incorporation Documents of Applicant, showing:
    - i. The Name of the Company.
    - ii. Date when Applicant was Incorporated.
    - iii. Place where Applicant was Incorporated.
    - iv. Nature of Business Activities (The German Translation is "Gegenstand des Unternehmens").
    - v. Initial Stock Holdings (The German Translation is "Stammkapital").
    - vi. List of Directors.
  
2. In respect of **Optical, weighing, measuring, signaling, checking, supervision, life-saving and teaching apparatus and instruments, acoustic alarms, Weighing equipment**, for which Applicant has applied to register the Mark in International Class 009:
  - a. **cameras**
  - b. **ground reaction force plates**
  - c. **force sensors**
  - d. **pressure sensors**

- e. **pressure distribution sensors**
- f. **electronic display boards**
- g. **fire extinguishers**
- h. **smoke and fire alarms**
- i. **scales and balances**
- j. **Weighing platters sold as a component of scanner scales**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. Advertisements for each of the said goods.
- v. Price lists of each of the said goods.
- vi. Parts lists with illustrations and prices for each of the said goods.
- vii. Government approvals for the sale and use of each of the said goods.
- viii. Names and addresses of Dealers which sell each of the said goods.
- ix. Names and addresses of Dealers which maintain and repair each of the said goods.
- x. All safety certifications for each of the said goods including, but not limited to standard safety Marks: TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.

- xi. Pictures of Manufacturers nameplates for each of the said goods showing Model Number, Serial Number, and safety certifications.
3. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 009:
- a. **Thermostats**
  - b. **Infra-red thermometers**
  - c. **Thermometers not for medical purposes**

The following documentation is requested:

- i. Pictures of each of the said goods.
  - ii. Brochures for each of the said goods.
  - iii. Owner Manuals / User Manuals for the said goods.
  - iv. Advertisements for each of the said goods.
  - v. Price lists for each of the said goods.
  - vi. Names and addresses of Dealers which sell each of the said goods.
4. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 009:
- a. **apparatus for recording of sound or images**
  - b. **Apparatus for transmission of sound or images**

c. **Apparatus for reproduction of sound or images**

The following documentation is requested:

- i. Pictures of each of the said goods.
  - ii. Brochures for each of the said goods.
  - iii. Owner Manuals / User Manuals for the said goods.
  - iv. Advertisements for each of the said goods.
  - v. Price lists for each of the said goods.
  - vi. Parts lists with illustrations and prices for each of the said goods.
  - vii. Names and addresses of Dealers which sell each of the said goods.
  - viii. Names and addresses of Dealers which maintain and repair each of the said goods.
  - ix. All safety certifications for each of the said goods including, but not limited to, standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.
  - x. Pictures of Manufacturers nameplates of each of the said goods showing Model Number, Serial Number, and safety certifications.
5. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 009:

- a. **computer hardware for the remote control of furniture**
- b. **computer software for the remote control of furniture**
- c. **communication between measurement equipment and control of the furniture or medical facilities**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. Advertisements for each of the said goods.
- v. DVD Disks, Flash Drives, Hard Drives, and other installation media containing the software.
- vi. An explanation of which platforms the software is compatible with (e.g. Windows, Linux, Unix).
- vii. Parts lists with illustrations and prices for each of the said goods.
- viii. Names and addresses of Dealers which sell each of the said goods.
- ix. Names and addresses of Dealers which program, maintain and repair each of the said goods.
- x. Government approvals for the sale, supply and use of each of the said goods for use for medical purposes.
- xi. The names and addresses of medical facilities where each of the said goods are

installed and used.

- xii. All safety certifications for each of the said goods including, but not limited to, standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.
  - xiii. Pictures of Manufacturers nameplates of each of the said goods showing Model Number, Serial Number, and safety certifications.
6. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 009:
- a. **measuring instruments to measure body values and vital signs**
  - b. **measuring apparatus to measure body values and vital signs**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. Advertisements for each of the said goods.
- v. Price lists for each of the said goods.
- vi. Parts lists with illustrations and prices for each of the said goods.
- vii. Names and addresses of Dealers which sell each of the said goods.
- viii. Names and addresses of Dealers which maintain and repair each of the said

goods.

- ix. Government approvals for the sale, supply and use of each of the said goods for medical purposes.
  - x. The names and addresses of medical facilities where each of the said goods are installed and used.
  - xi. All safety certifications for each of the said good including, but not limited to standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.
  - xii. Pictures of Manufacturers nameplates of each of the said goods showing Model Number, Serial Number, and safety certifications.
7. In respect of **electric measuring devices, to measure body values and vital signs** for which Applicant has applied to register the Mark in International Class 009:

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. Advertisements for each of the said goods.
- v. Price lists for each of the said goods.
- vi. Parts lists with illustrations and prices for each of the said goods.

- vii. Names and addresses of Dealers which sell each of the said goods.
  - viii. Names and addresses of Dealers which maintain and repair each of the said goods.
  - ix. Government approvals for the sale, supply and use of each of the said goods for medical purposes.
  - x. The names and addresses of medical facilities where each of the said goods are installed and used.
  - xi. All safety certifications for each of the said goods including, but not limited to standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.
  - xii. Pictures of Manufacturers nameplates of each of the said goods showing Model Number, Serial Number, and safety certifications.
8. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 009:
- a. **electronic notice boards**
  - b. **electronic display boards**
  - c. **plasma display boards**
  - d. **electronic display screens.**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. DVD Disks, Flash Drives, Hard Drives, and other installation media containing the software required to operate each of the said goods.
- v. An explanation of which platforms the software is compatible with (e.g. Windows, Linux, Unix).
- vi. Price lists of each of the said goods.
- vii. Advertisements for each of the said goods.
- viii. Parts lists with illustrations and prices for each of the said goods.
- ix. Names and addresses of Dealers which sell each of the said goods.
- x. Names and addresses of Dealers which program, maintain and repair each of the said goods.
- xi. Government approval for the sale, supply and use of each of the said goods for medical purposes.
- xii. The names and addresses of medical facilities where each of the said goods are installed and used.
- xiii. All safety certifications for each of the said goods including, but not limited to standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.
- xiv. Pictures of Manufacturers nameplates of each of the said goods showing Model

Number, Serial Number, and safety certifications.

9. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 009:
- a. **downloadable electronic publications in the nature of newsletters manuals**
  - b. **books, leaflets in the field of computer software for intelligent home**
  - c. **books, leaflets in the field of computer hardware for intelligent home**

The following documentation is requested:

- i. Pictures of each of the said goods and services.
- ii. Brochures for each of the said goods and services.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. Advertisements for each of the said goods and services.
- v. An explanation of which platforms the software is compatible with (e.g. Windows, Linux, Unix).
- vi. An explanation of the procedure used to download each of the said goods, together the website names and log-in credentials required to download same.
- vii. Price lists of each of the said goods and services.
- viii. Names and addresses of Dealers which sell each of the said goods and services.
- ix. Names and addresses of software experts which program, maintain and repair each of the said goods and services.

10. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 009:

- a. **electronic pens for visual display units**
- b. **transmitters of electronic signals**
- c. **electro-dynamic apparatus for the remote control of signals**
- d. **testing apparatus not for medical purposes for body values and vital signs**
- e. **diagnostic apparatus, not for medical purposes for body values and vital signs**
- f. **thermometers, not for medical purposes**
- g. **ultrasound apparatus, not for medical purposes to measure body values and vital signs**
- h. **measuring, monitoring and evaluation apparatus for detecting substances or substance parameters within the human body and body values, in particular for non-invasive measurement:**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. Advertisements for each of the said goods.
- v. DVD Disks, Flash Drives, Hard Drives, and other installation media containing the software required to operate said goods.

- vi. An explanation of which platforms the software is compatible with (e.g. Windows, Linux, Unix).
  - vii. Advertisements for said goods.
  - viii. Parts lists with illustrations and prices for said goods.
  - ix. Names and addresses of Dealers which sell said goods.
  - x. Names and addresses of Dealers which program, maintain and repair said goods.
  - xi. All safety certifications for said products including, but not limited to, standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.
  - xii. Pictures of Manufacturers nameplates showing Model Number, Serial Number, and safety certifications.
11. In respect of each of the following goods and services for medical purposes for which Applicant has applied to register the Mark in International Class 10:
- a. **Medical X-ray apparatus**
  - b. **body rehabilitation apparatus for medical purposes**
  - c. **electrodes for medical use**
  - d. **cushions for medical purposes to sit and sleep**
  - e. **lasers for medical purposes**
  - f. **air pillows for medical purposes**
  - g. **air cushions for medical purposes**
  - h. **air mattresses, for medical purposes**

- i. **medical apparatus and instruments for monitoring oxymetry, gas analysis, vital signs, blood properties and respiratory events**
- j. **medical guidewires**
- k. **physical exercise apparatus, for medical purposes**
- l. **needles for medical purposes**
- m. **vacuum pumps for medical purposes**
- n. **quartz lamps for medical purposes**
- o. **radiological apparatus for medical purposes**
- p. **probes for medical purposes**
- q. **furniture especially made for medical purposes**
- r. **thermometers for medical purposes**
- s. **dropper bottles for dispensing medicines sold empty**
- t. **ultrasound apparatus for medical purposes**
- u. **ultraviolet lamps for medical purposes**
- v. **nebulizers for medical purposes**
- w. **Blood testing apparatus**
- x. **Blood glucose meters**
- y. **Blood pressure monitors**
- z. **Sphygmomanometers**
- aa. **Meters for medical use, namely, for positive airway pressure therapy**
- ab. **measuring pulse, heart rate, detectors for use as a health monitoring device**

- ac. **skin perspiration detectors for use as a health monitoring device**
- ad. **biofeedback sensors**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. DVD Disks, Flash Drives, Hard Drives, and other installation media containing the software required to operate each of the said goods.
- v. An explanation of which platforms the software is compatible with (e.g. Windows, Linux, Unix).
- vi. Price lists for each of the said goods.
- vii. Advertisements for each of the said goods.
- viii. Parts lists with illustrations and prices for each of the said goods.
- ix. Names and addresses of Dealers which sell each of the said goods.
- x. Names and addresses of Dealers which program, maintain and repair each of the said goods.
- xi. Government approval for the sale, supply and use of each of the said goods for medical use.
- xii. The names and addresses of medical facilities where each of the said goods are installed and used.

- xiii. All safety certifications for each of the said goods including, but not limited to standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.
  - xiv. Pictures of Manufacturers nameplates of each of the said goods showing Model Number, Serial Number, and safety certifications.
12. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 011:
- a. **Sinks**
  - b. **extractor hoods for kitchens**
  - c. **hydromassage bath apparatus**
  - d. **bath tubs**
  - e. **bath installations**
  - f. **lamps, led lamps**
  - g. **furnaces**
  - h. **electric radiant and space heaters**
  - i. **water heaters**
  - j. **hot water tanks**
  - k. **boilers**
  - l. **heat pumps**
  - m. **electric slow cookers**

- n. **cooking ovens**
- o. **microwave ovens**
- p. **gas cooktops**
- q. **electric cooktops**
- r. **food roasting machines**
- s. **electric pressure cookers**
- t. **barbecues**
- u. **gas grills**
- v. **electric grills**
- w. **electric rice cookers**
- x. **pizza machines in the nature of baking ovens**
- y. **electric sandwiches toasters**
- z. **refrigerators**
- aa. **freezers**
- ab. **ice machines and apparatus**
- ac. **wine coolers in the nature of refrigerated cabinets containing racks for wine bottles and storage shelves**
- ad. **water coolers**
- ae. **electric fans**
- af. **ventilation hoods**
- ag. **air humidifiers**

- ah. **water dispensers and purifiers**
- ai. **showers**
- aj. **shower cubicle enclosures**
- ak. **shower heads**
- al. **regulating accessories for water apparatus and pipes**
- am. **regulating accessories for gas apparatus and pipes**
- an. **bidets**
- ao. **toilets**
- ap. **portable toilets**
- aq. **.waterless toilets**
- ar. **sinks**
- as. **specialized integrated pressurized flushing cistern and flushing device**  
**integrated in a toilet comprised of flush levers, single and dual flush valves, fill**  
**valves, flush levers, buttons, push plates, discharge and drainage pipes**
- at. **pre-fabricated exposed and concealed cistern with or without frame for**  
**carrying a bidet, toilet, urinal and washbasin**
- au. **bath tubs for sitz baths**
- av. **solar water heaters**
- aw. **water closets**
- ax. **toilet bowls**
- ay. **toilet seats**

- az. **portable toilets**
- ba. **water heaters**
- bb. **hot-water heating systems for residential and commercial buildings comprised of boilers, valves, pipes, manifolds, solar panels, control panel, switches and electrical wire**
- bc. **bath fittings, namely, Plumbing fitting, namely, vacuum release safety valve for flow shutoff in pools and spas, shower control valves, tub control valves, couplers, drains, faucet filters, spouts, baffles, sink strainers, traps, valves**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. Advertisements for each of the said goods.
- v. Parts lists with illustrations and prices for each of the said goods.
- vi. Names and addresses of Dealers which sell each of the said goods.
- vii. Names and addresses of Dealers which maintain and repair each of the said goods.
- viii. Government approvals for the sale, supply and use of each of the said goods.
- ix. All safety certifications for each of the said goods including, but not limited to, standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute,

Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.

- x. Pictures of Manufacturers nameplates of each of the said goods showing Model Number, Serial Number, and safety certifications.
13. In respect of **Non-metallic building materials for fitted kitchens** for which Applicant has applied to register the Mark in International Class 019:
- a. **semi-worked woods for fitted kitchens**
  - b. **wood veneer for fitted kitchens**
  - c. **laminated plastic for fitted kitchens**
  - d. **laminated wood for fitted kitchens**
  - e. **glass for building**
  - f. **non-metallic rigid pipes for building**
  - g. **asphalt**
  - h. **pitch**
  - i. **bitumen**
  - j. **non-metallic transportable buildings**
  - k. **monuments, not of metal**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.

- iii. Owner Manuals / User Manuals for the said goods.
  - iv. Advertisements for each of the said goods.
  - v. Names and addresses of Dealers which sell each of the said goods.
  - vi. Names and addresses of Dealers which maintain and repair each of the said goods.
  - vii. Government approvals for the sale, supply and use of each of the said goods.
  - viii. All safety certifications for each of the said goods.
14. In respect of each of the following goods and services for which Applicant has applied to register the Mark in International Class 020:
- a. **Furniture and furniture parts**
  - b. **furniture made of wood**
  - c. **furniture made of plastic**
  - d. **furniture of wood and plastic combined**
  - e. **furniture walls**
  - f. **kitchen furniture**
  - g. **furniture for the home**
  - h. **furniture for the bathroom**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. Price lists for each of the said goods.
- v. Parts lists with illustrations and prices for each of the said goods.
- vi. Names and addresses of Dealers which sell each of the said goods.
- vii. All safety certifications for each of the said goods including, but not limited to standard safety Marks TÜV Rheinland, VDE Testing and Certification Institute, Underwriters Laboratories, CSA International, NEMKO, DEMKO, FIMKO, SEMKO.

15. In respect of each of the following goods and services for which Applicant applied to register the Mark in International Class 038:

- a. **computer-aided transmission of messages, data and images**
- b. **Providing access to information on the Internet**
- c. **electronic relaying of messages**
- d. **Internet service provider (ISP)**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.

- iv. DVD Disks, Flash Drives, Hard Drives, and other installation media containing the software required to operate each of the said goods.
  - v. An explanation of which platforms the software is compatible with (e.g. Windows, Linux, Unix).
  - vi. Price lists for each of the said goods.
  - vii. Advertisements for each of the said goods.
  - viii. Names and addresses of Dealers which sell each of the said goods.
  - ix. Names and addresses of Dealers which program, maintain and repair each of the said goods.
  - x. The address of the website of the Internet Service Provider. (ISP).
16. In respect of **Medical services** for which Applicant has applied to register the Mark in International Class in International Class 044.
- a. **conducting of medical examinations on the human body**
  - b. **conducting of examinations of body fluids**
  - c. **medical analysis of measurement data**
  - d. **preparing recommendations based on the analysis of measurement data**
  - e. **medical analysis services relating to the treatment of persons provided by a medical laboratory**

The following documentation is requested:

- i. Pictures of each of the said goods.
- ii. Brochures for each of the said goods.
- iii. Owner Manuals / User Manuals for the said goods.
- iv. DVD Disks, Flash Drives, Hard Drives, and other installation media containing the software required to operate each of the said goods.
- v. An explanation of which platforms the software is compatible with (e.g. Windows, Linux, Unix).
- vi. Price lists for each of the said goods.
- vii. Advertisements for each of the said goods.
- viii. Names and addresses of Dealers which sell each of the said goods.
- ix. Names and addresses of the facilities which perform the said medical examinations.
- x. Names and addresses of the laboratories which perform the said medical analysis.
- xi. Government approval for the sale, supply and use of each of the said goods for medical use.

Dated: February 29, 2016

LARRY PALETZ

/Larry Paletz/

Larry Paletz

1493 Caminito Solidago

La Jolla, CA 92037

858-459-1000 (Telephone)

Lpaletz@wellmann.com (Email)

Opposer

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

In the matter of Application Serial Number: 79143534  
Filed: September 11, 2013  
For the mark: Tielsa  
Published in the *Trademark Official Gazette* on May 26, 2015

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Larry Paletz

Opposer

v.

Proceeding Number 91224067

Tielsa GmbH,

Applicant

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**CERTIFICATE OF SERVICE BY MAIL**

STATE OF CALIFORNIA     )  
  ) ss.  
COUNTY OF SAN DIEGO    )

Larry Paletz, of the City of La Jolla, County of San Diego, in the State of California, hereby certifies under penalty of perjury of the laws of the State of California, that on the 29<sup>th</sup> day of February 2016, he mailed a true and correct copy of Opposer's:

**PRELIMINARY DEMAND FOR DISCOVERY**

in the above-captioned action to the last known address, corrected by the United States Postal Service, per First Class Mail and email, 2016, to-wit:

DANIELA FUESSEL  
FUESSEL LAW  
475 Washington Blvd  
Venice, CA 90292-5287  
E-Mail: schiller@f-200.com



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February 29, 2016