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

Proceeding	92042082
Party	Defendant International Gold Star Trading Corp.
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Date	04/28/2010
Attachments	Krasnov Transcript.pdf (36 pages)(111227 bytes) Registrant Ex. 138.pdf (2 pages)(109374 bytes)

1
2 IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
3 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD
4

5	FOUR SEASONS DAIRY, INC.,)	
)	
	Petitioner,)	
6)	Cancellation No.
	vs.)	92/042,082
7)	Mark: Babushka's
	INTERNATIONAL GOLD STAR)	Recipe
8	TRADING CORP.,)	Reg. No. 2,479,287
)	
9	Registrant.)	
	-----)	

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12
13 DEPOSITION OF VLADIMIR KRASNOV
14 New York, New York
15 Monday, October 20, 2008
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24 Reported by:
FRANCIS X. FREDERICK, CSR, RPR, RMR
JOB NO. 19191
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October 20, 2008
11:51 a.m.

Deposition of VLADIMIR KRASNOV,
held at the offices of Cohen, Pontani,
Lieberman & Pavan, 551 Fifth Avenue, New
York, New York, pursuant to Notice,
before Francis X. Frederick, a Certified
Shorthand Reporter, Registered Merit
Reporter and Notary Public of the States
of New York and New Jersey.

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A P P E A R A N C E S:

SAMUEL FRIEDMAN, ESQ.
Attorneys for Petitioner
225 Broadway - Suite 1804
New York, New York 10007

COHEN PONTANI LIEBERMAN & PAVANE, LLP
Attorneys for Registrant
551 Fifth Avenue - Suite 1210
New York, New York 10176

BY: ROGER S. THOMPSON, ESQ.

ALSO PRESENT:

GALINA PINCOW, International Gold Star

1 V. KRASNOV

2 (Registrant's Exhibit 138, amended
3 Notice of Deposition of Vladimir
4 Krasnov, marked for identification as of
5 this date.)

6 * * *

7 V L A D I M I R K R A S N O V, called as a
8 witness, having been duly sworn by a
9 Notary Public, was examined and
10 testified as follows:

11 EXAMINATION BY

12 MR. THOMPSON:

13 Q. Mr. Krasnov, I'll ask you to take
14 a look at a document that's been handed to you
15 and marked as Registrant's Exhibit 138. For
16 the record, it's entitled the Amended Notice
17 of Deposition of Vladimir Krasnov of V.M. Food
18 Service Corp. at 15600 West Ten Mile Road,
19 Unit 12 Southfield, Michigan. And I'll ask
20 you if you are that Vladimir Krasnov.

21 A. Yes, I am.

22 Q. Could you please tell me if you
23 are currently employed.

24 A. Yes.

25 Q. And where are you currently

1 V. KRASNOV

2 employed?

3 A. The company.

4 Q. And that would be V.M. Food
5 Service Corporation?

6 A. Yeah.

7 Q. What does V.M. Food Service
8 Corporation do?

9 A. It's my abbreviation. Me,
10 Vladimir. And M is my wife.

11 Q. And what kind of business are you
12 in?

13 A. It's grocery store. It's Russian
14 food store.

15 Q. Do you operate that under any
16 trade name other than V.M. Food Service
17 Corporation?

18 A. We got a d/b/a New York
19 International.

20 Q. And that would be New York
21 International Store?

22 A. Um-hum.

23 Q. Are you familiar with the company
24 called International Gold Star Trading
25 Corporation?

1 V. KRASNOV

2 A. Yes, sir.

3 Q. What is your familiarity with that
4 establishment?

5 A. It's from very beginning. It's
6 from 1995, I believe. That's time we open the
7 business.

8 Q. Well, what is your relationship
9 between your store, New York International
10 Store, and the International Gold Star
11 Trading?

12 A. No, we order product every week
13 usually. From that time.

14 Q. And that would be from the time
15 you started the business?

16 A. Um-hum, yes.

17 Q. And I'm sorry. When did you start
18 the business?

19 A. It's 1995. It's November.

20 Q. Okay. And I think you said you
21 ordered products from them every week?

22 A. Every week, yeah.

23 Q. Could you tell me what kind of
24 products you ordered from them?

25 A. Is dairy product, meat product and

1 V. KRASNOV

2 grocery.

3 Q. Are you familiar with any products
4 sold by Gold Star under the Babushka's Recipe
5 name?

6 A. Oh, yeah.

7 Q. Have you ever purchased Babushka's
8 Recipe products from Gold Star?

9 A. Yeah, we did.

10 Q. What kind of products?

11 A. Cheese. Farmer cheese and yogurt
12 cheese. A lot of dairy product. I don't
13 remember. Sour cream I believe.

14 Q. Do you remember the first time you
15 purchased dairy products under the Babushka's
16 Recipe name from International Gold Star?

17 A. It's 1997 or 1998. I don't
18 remember really.

19 Q. On what do you base your
20 recollection?

21 A. I don't understand the question.

22 Q. You said you think it was from
23 '97, '98 and --

24 A. '98. Maybe beginning of '98.

25 Q. I'll ask you to take a look at an

1 V. KRASNOV

2 exhibit we've previously had marked as
3 Respondent's or Registrant's 115 which I think
4 is going to be in that large package.

5 (Pause on the record.)

6 Q. Please let me know after you've
7 had a chance to look at that document.

8 (Document review.)

9 A. Yes.

10 Q. Does it look familiar to you?

11 A. Yes. This is invoice we used to
12 have it.

13 Q. I'm sorry. I couldn't understand
14 you. Could I ask you to speak up. We have a
15 loud vent over my head so I'm having a hard
16 time hearing you.

17 A. Yeah. This invoice we used to
18 have it that time.

19 Q. And is that an invoice from
20 International Gold Star to your business?

21 A. Yes.

22 Q. Would you be able to tell me from
23 looking at this invoice if this reflects any
24 Babushka's Recipe products sold by Gold Star
25 to your store?

1 V. KRASNOV

2 A. Yes. Farmer cheese. Grandma
3 Recipe is the same thing as the Babushka's
4 Recipe and Grandma's Recipe. Is the same
5 thing.

6 Q. And could you please identify --

7 A. The second page.

8 Q. Now, you said that the Babushka's
9 Recipe is the same thing as Granny's Recipe?

10 A. Yeah. Same as Babushka is. It's
11 abbreviation in Russian is Babushka.
12 Grandmother is the same. Babushka's Recipe,
13 Grandmother's Recipe. For our customers the
14 same.

15 Q. And what type of customers do you
16 have?

17 A. International. Russian. Polish.
18 Ukrainian. From East Europe. Western Europe.

19 Q. And your customers then
20 understand -- I'm sorry. Let me ask the
21 question differently.

22 The products as you actually sell
23 them, does it have a name on the product?

24 A. Yes.

25 Q. What is the name that's on the

V. KRASNOV

1
2 product?

3 A. The name on the product Babushka's
4 Recipe.

5 Q. And is there a particular label
6 that is on those products?

7 A. Particular label?

8 Q. Yes. With the name Babushka's
9 Recipe?

10 A. It's Babushka. It looks like
11 Babushka. It's old Russian woman.

12 Q. I'll ask you to look at what's
13 been marked previously as Exhibit 102. It
14 should be in that pile over there.

15 (Document review.)

16 A. Um-hum. Yes.

17 Q. And you've seen that before?

18 A. Yes.

19 Q. Could you please identify what
20 that is?

21 A. It's Babushka.

22 Q. Could you elaborate a little bit
23 more. Just say a little more about it.

24 A. About label?

25 Q. Yes. I mean, have you seen it

V. KRASNOV

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before?

A. Yes, I do.

Q. In what context have you seen that before?

A. I don't understand.

Q. Have you seen products shipped to you bearing this label?

A. Yes.

Q. Now, this particular product according --

A. It's not only cheese. I think it's butter, too. Dairy product. Cheese. Farmer cheese. Yogurt cheese.

Q. This particular label says that it's Havarti yogurt cheese.

A. Okay.

Q. And I believe you said you had bought yogurt cheese from --

A. Yes.

Q. -- Gold Star?

And is this the label that was on those products when you bought them?

A. Yes.

Q. Do you know how long you've been

1 V. KRASNOV

2 buying yogurt cheese from Gold Star?

3 A. For how long?

4 Q. Yes.

5 A. From that time when I opened the
6 store.

7 Q. Do you remember how long you've
8 been purchasing --

9 A. Babushka?

10 Q. I'm sorry?

11 A. What your question is? Sorry.

12 Q. I'm going to ask you a different
13 question.

14 Do you remember how long you've
15 been buying yogurt cheese with the Babushka's
16 Recipe label on it from Gold Star?

17 A. For how long? Let me think.

18 I don't remember.

19 Q. How often do you buy Babushka's
20 Recipe dairy products from --

21 A. Every week.

22 Q. And they are shipped to your store
23 in Michigan?

24 A. Yeah. By transportation company.

25 Q. Now, with respect to what we've

1 V. KRASNOV

2 looked at, Exhibit 115, that's the invoice.

3 A. Yeah.

4 Q. I'll ask you to look at that
5 again.

6 A. Yes.

7 Q. The date on it is December 18th of
8 1998. Do you recollect if that would have
9 been the first purchase of Babushka's Recipe
10 products you made from Gold Star?

11 A. The first purchase you said?

12 Q. Yes.

13 A. I don't remember. First or
14 second.

15 Q. Well, you had testified I believe
16 that you had purchased it in early December of
17 1998 and this invoice is dated December of
18 1998.

19 A. I don't remember.

20 MR. FRIEDMAN: And just note my
21 objection.

22 MR. THOMPSON: I have nothing
23 further.

24 * * *

25

1 V. KRASNOV

2 EXAMINATION BY

3 MR. FRIEDMAN:

4 Q. My name is Samuel Friedman and I
5 represent Four Season Dairy. Good afternoon.

6 A. Hi.

7 Q. You've also been ordering meats
8 under the Babushka's Recipe label.

9 A. Yes.

10 Q. Correct?

11 And you've been ordering those
12 meats under the Babushka's Recipe label since
13 the beginning also?

14 A. Yeah. Not from beginning. I
15 don't remember at the beginning. But I know I
16 order it.

17 Q. So you ordered it -- the beginning
18 was 1995 when you opened your store I believe
19 you testified.

20 A. What your question?

21 Q. When did you open your store, V.M.
22 International --

23 A. 1995.

24 Q. And since that time you've been
25 buying from Gold Star.

1 V. KRASNOV

2 A. Yes.

3 Q. And you've been buying different
4 kinds of products from Gold Star.

5 A. Yes, sir.

6 Q. Including fish and meats and
7 dairy, correct?

8 A. Um-hum.

9 Q. Okay. So you started purchasing
10 the Babushka's Recipe meat products from
11 International Gold Star around or about the
12 time you started purchasing the dairy
13 products, right?

14 A. Yes.

15 Q. Okay. And you've continued
16 purchasing meat products and dairy products
17 since that time from International Gold Star.

18 A. Yes.

19 Q. True?

20 Okay. And the label that has been
21 on the product, if you could take a look at
22 102, Exhibit 102 that Mr. Thompson showed to
23 you --

24 A. This one (indicating)?

25 Q. Yeah. That's the same label

1 V. KRASNOV

2 that's been on the product for all the time
3 that you've been purchasing it, right?

4 MR. THOMPSON: Objection to form.

5 We've talked about several different
6 products.

7 Q. Okay. The Babushka's Recipe label
8 that you see in 102, is it more or less the
9 same now as it was when you started purchasing
10 Babushka's Recipe dairy products from
11 International Gold Star?

12 MR. THOMPSON: Object to form as
13 to more or less.

14 A. I don't remember.

15 Q. Well --

16 A. It was ten years ago.

17 Q. Ten years ago that -- what do you
18 mean ten years ago?

19 A. No, I mean from this time.

20 Q. So you don't remember then what
21 the label looked like.

22 A. No. I remember it looked like I
23 got here (indicating) but your question I
24 don't understand.

25 Q. When you say "here" you're

1 V. KRASNOV

2 pointing to Exhibit 102.

3 A. (Witness nods.)

4 Q. Correct? I'm sorry. Just for the
5 record, so that people later on know what
6 we're talking about, when you point to
7 something you just need to identify it by the
8 exhibit number. This is 102.

9 A. Okay.

10 Q. And you were just pointing to 102,
11 correct?

12 A. Okay. Yes.

13 Q. So then is it the case that you do
14 not remember what the label looked like in
15 1998?

16 A. No, I remember. It looks like I
17 got in front of me. It's look like here.

18 Q. Okay. In 1998 it looked like 102.

19 A. Um-hum.

20 Q. And what about in 1995 when you
21 started purchasing?

22 MR. THOMPSON: Objection. He
23 didn't say that.

24 A. No, that's --

25 Q. No?

1 V. KRASNOV

2 A. No.

3 Q. When did you start purchasing
4 Babushka's Recipe from International Gold
5 Star?

6 A. I believe it's 1998. 1998.

7 Q. And how did you order the product
8 from International Gold Star? In what manner
9 did you communicate to Gold Star that you
10 wanted them to deliver product to you?

11 A. How can I order it? By phone.

12 Q. Was that the only way that you
13 used to order was a telephone?

14 A. Yeah. I pick up the phone and
15 tell. Because we got order every week. It's
16 easy, you know. Gold Star were established
17 and we were established and every week we make
18 order by the phone.

19 Q. Was it the same order every week?

20 A. No, different. Because one week
21 it's slow, one week it's busy.

22 Q. Okay. And how did you identify to
23 Gold Star the product that you wanted them to
24 send to you?

25 A. I don't understand the question.

1 V. KRASNOV

2 Q. Well, let's take a look at
3 Exhibit 115 that's been placed in front of
4 you. Okay? Do you see that on the left-hand
5 side there are product numbers?

6 A. Um-hum.

7 Q. Like the very top it's 63303. For
8 Polish Tortik?

9 A. Okay.

10 Q. And CD37 for -- what is that?

11 A. Halva.

12 Q. Halva? Vanilla halva?
13 And SL03 for pickle half sour?

14 A. Um-hum.

15 Q. So would you use the product
16 number when ordering products from Gold Star?

17 A. Use the name.

18 Q. And what name did you use when you
19 wanted to order yogurt, Babushka's Recipe
20 yogurt cheese?

21 A. That's what I said. Babushka's
22 Recipe yogurt cheese.

23 Q. And were you ordering that back in
24 1998?

25 A. Yes.

1 V. KRASNOV

2 Q. Were you also ordering Babushka's
3 Recipe garlic yogurt cheese?

4 A. Garlic yogurt cheese?

5 Q. Yeah.

6 A. I know this cheese because it's
7 more selling. The garlic yogurt cheese, I
8 think yes. I think. It's too hard to say
9 really. I don't remember.

10 Q. How about the vegetable yogurt
11 cheese, was that a popular seller in 1998?

12 A. No. Not in my location.

13 Q. Did you try it but it didn't work
14 out?

15 A. Not that I remember.

16 Q. Did there ever come a time when
17 you started using code numbers for purposes of
18 ordering International Gold Star products?

19 MR. THOMPSON: I'll object to code
20 numbers because I'm not sure I know what
21 you mean.

22 Q. Well, product numbers.

23 A. We ordered it by the name. It's
24 easier to understand for us and for vendor.

25 Q. So the vendor being Gold Star.

1 V. KRASNOV

2 A. Yes.

3 Q. Did you use International Gold
4 Star's catalogues for purposes of ordering
5 products from Gold Star?

6 A. Yes. Oh, yes.

7 Q. And --

8 A. It's easier to make order.

9 Q. From a catalogue.

10 A. Yeah. If you open the catalogue,
11 if you forgot something you can see in the
12 pictures how look likes, and the name, you
13 know, because you couldn't keep in memory
14 everything.

15 Q. Of course. So did Gold Star send
16 to you its catalogues?

17 A. Yeah.

18 Q. And were they doing that from the
19 beginning when you started?

20 A. Yeah. From the beginning.

21 Q. And did those catalogues have all
22 of Gold Star's products?

23 A. Yes.

24 Q. So the catalogue had the -- for
25 example, the Babushka's Recipe meats back in

1 V. KRASNOV

2 1998 when you were placing this order?

3 MR. THOMPSON: Objection.

4 A. Meats? I remember cheese but I
5 don't remember meats.

6 Q. You remember cheese being in the
7 catalogue in 1998?

8 A. Yeah, um-hum.

9 Q. Was fish in the catalogue also in
10 1998.

11 A. Yes.

12 MR. THOMPSON: I was just going to
13 say you weren't clear if there's a
14 Babushka's Recipe fish or just a fish in
15 general?

16 Q. Oh, I was referring to Babushka's
17 Recipe.

18 A. No. Just fish. No Babushka's
19 Recipe fish. Only smoke fish.

20 Q. But the Babushka's Recipe dairy
21 was in the catalogue in 1998.

22 A. Yes.

23 Q. Do you remember buying Babushka's
24 Recipe product that did not have the
25 grandmother on it? And by the grandmother

1 V. KRASNOV

2 right now I'm pointing to 102.

3 A. No. No.

4 Q. So what kinds of products did you
5 order from Gold Star back in 1998 apart from
6 the farmers cheese that you've mentioned?

7 A. Are you talking about dairy
8 product?

9 Q. I'm talking about dairy products
10 now.

11 A. It's butter.

12 Q. Yes.

13 A. Sour cream. Tvorog. I don't know
14 if -- farmer cheese and Tvorog is same thing.

15 Q. That's what they tell me. That
16 it's the same thing. I don't know.

17 A. It's the same thing.

18 And the farmer cheese and the
19 yogurt cheese. We're talking about Babushka's
20 Recipe, right?

21 Q. Yes.

22 A. Dairy.

23 Q. Yes.

24 Okay. So you ordered all of those
25 products since 1998 in your -- for your store.

1 V. KRASNOV

2 A. Yes.

3 Q. And were you ordering those
4 products, those Babushka's Recipe products
5 also before 1998?

6 A. No.

7 Q. 1998 is when you started.

8 A. Yes.

9 Q. So from 1995 until 1998 you did
10 not sell Babushka's Recipe dairy products; is
11 that right?

12 A. No.

13 Q. You agree with me that you did not
14 sell Babushka's Recipe dairy products from
15 1995 until 1998.

16 A. I don't think -- I don't remember
17 exactly because I don't want to -- I want to
18 tell you the truth. I don't remember if
19 exactly.

20 Q. Have you ever been business
21 partners with Robert Pincow?

22 A. No.

23 Q. Does he have any -- does he own
24 any interest in your store?

25 A. No. No.

1 V. KRASNOV

2 Q. Were you ever convicted of a
3 crime?

4 A. No.

5 Q. Now, what you see here in
6 Exhibit 102 --

7 MR. THOMPSON: You're holding
8 Exhibit 115 in your hand, counsel.

9 MR. FRIEDMAN: Sorry about that.

10 Q. Exhibit 115. Is this the way the
11 Gold Star invoices look today?

12 A. Yeah.

13 Q. They look the same as they did
14 back in 1998.

15 A. It's the same. It's colored.

16 Q. I'm sorry. What I was holding was
17 actually a photocopy of the original or the
18 purported original that you have in front of
19 you.

20 A. Um-hum. Yeah. Yes.

21 Q. They look the same today as they
22 did then?

23 A. Today? No, today is little
24 different. I think it's -- telephone is the
25 same. The logo is the same. Maybe some

1 V. KRASNOV

2 design or the -- some -- on the base it's Gold
3 Star. Address same. Phone is the same.

4 MR. THOMPSON: My question was
5 just that you were directing his
6 attention to your copy of 115 and then
7 he looked at the original of 115. And I
8 don't think the record is necessarily
9 clear when he was looking at your copy
10 which is across the table from him as
11 opposed to the original which is right
12 in front of him. I don't know the
13 extent he has, if any, a problem seeing
14 that far. I know I would. So I just
15 wanted to be clear when he was looking
16 at the original document which was in
17 front of him.

18 MR. FRIEDMAN: Very well. I think
19 you cleared it up.

20 MR. THOMPSON: Yeah.

21 MR. FRIEDMAN: Okay.

22 BY MR. FRIEDMAN:

23 Q. When you placed the orders with
24 Gold Star back around the time of this
25 exhibit, 115, with whom did you speak at Gold

1 V. KRASNOV

2 Star to place your order?

3 A. Some representative salesman.

4 Q. Did you speak to people that
5 worked in the warehouse?

6 A. In the office I think.

7 Q. Do you remember the name of the
8 person that you spoke with?

9 A. No. No, I don't.

10 Q. Have you been to the International
11 Gold Star plant -- I'm sorry -- warehouse?

12 A. Yeah.

13 Q. Have you been there on many
14 occasions? How often do you go there to the
15 warehouse?

16 A. How often?

17 Q. Yeah.

18 A. From -- how often from what?

19 Q. Let's say back around the time
20 period of the invoice of 115 which is --
21 there's a date on it of December 18, 1998. So
22 during the time period of 1998, how often did
23 you go to the warehouse?

24 A. No, I'm going to New York like
25 every year to visit with my vendors to see

1 V. KRASNOV

2 what's new in the market. That's time I
3 visited the Gold Star.

4 Q. And you visited the Gold Star
5 warehouse?

6 A. Yeah.

7 Q. With whom did you speak in the
8 warehouse, the Gold Star warehouse?

9 A. In the company.

10 Q. Do you remember who any of the
11 names of the people you spoke with?

12 A. You mean -- no, I speak with the
13 owner.

14 Q. With the owner. Who's that?

15 A. Owner of the Gold Star?

16 Q. Yes.

17 A. Galina and Robert.

18 Q. Did you have any conversations
19 with the warehouse manager at International
20 Gold Star?

21 A. No.

22 Q. Did you order products from Beluga
23 Caviar?

24 A. No.

25 (Pause on the record.)

1 V. KRASNOV

2 Q. Was Gold Star selling any dairy
3 products under its own name; that is the name
4 of Gold Star back in around the time of this
5 invoice of 1998?

6 MR. THOMPSON: By this invoice
7 you're referring to 115.

8 MR. FRIEDMAN: Yes. Well, it's
9 the only invoice that the witness has in
10 front of him.

11 MR. THOMPSON: Just making the
12 record clear.

13 MR. FRIEDMAN: Yes.

14 A. What was the question.

15 Q. Around this time period of 1998
16 did you purchase dairy products from Gold Star
17 that had a Gold Star label?

18 MR. THOMPSON: I'll object to form
19 also.

20 A. I don't remember.

21 MR. THOMPSON: And now that
22 he's -- I'll point out that Exhibit 102
23 which is what we discussed as the
24 Babushka's Recipe label also has the
25 name Gold Star so --

1 V. KRASNOV

2 MR. FRIEDMAN: That's a very good
3 point, Mr. Thompson.

4 Q. Did you buy dairy products from
5 Gold Star that did not say Babushka's Recipe?

6 A. Dairy product, yeah.

7 Q. Yeah.

8 A. Yes.

9 Q. Did you buy products that had the
10 Gold Star -- the Gold Star mark --

11 A. I don't remember.

12 Q. -- but did not say Babushka's
13 Recipe?

14 You don't remember.

15 A. (Witness nods.)

16 Q. You have to answer audibly because
17 the court reporter cannot take down when you
18 shake your head.

19 A. I don't remember.

20 Q. In what manner did you pay for
21 your orders from International Gold Star back
22 in 1998?

23 A. What's the question?

24 Q. How did you pay for it?

25 A. Send a check.

1 V. KRASNOV

2 Q. How did you send a check?

3 A. By mail.

4 (Pause on the record.)

5 Q. Did you -- around or about the
6 period of 1998 and continuing until this day,
7 did you ever have to return any products back
8 to -- any dairy products back to International
9 Gold Star?

10 A. No.

11 MR. FRIEDMAN: No further
12 questions at this time.

13 EXAMINATION BY

14 MR. THOMPSON:

15 Q. I would just like to make clear,
16 because I'm not sure if the record is clear as
17 to your earliest recollection of the different
18 products that you purchased from Gold Star
19 under the name Babushka's Recipe.

20 Do you remember what the first
21 product you purchased was with the name
22 Babushka's Recipe? Exactly which -- the very
23 first product?

24 A. The first product, very first?

25 Q. With the name Babushka's Recipe.

1 V. KRASNOV

2 A. It's yogurt cheese.

3 Q. And do you remember if there came
4 a time when you later bought other products
5 from Gold Star with the name Babushka's
6 Recipe?

7 A. Yes.

8 Q. And we've seen from the invoice
9 that's in 115 that you bought farmers cheese
10 from them.

11 A. Okay.

12 Q. Do you remember when the first
13 time you bought farmers cheese was?

14 (Continued on next page to include
15 jurat.)

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V. KRASNOV

A. No, I don't.

MR. THOMPSON: I have nothing further.

MR. FRIEDMAN: No further questions.

THE WITNESS: Thank you.

MR. THOMPSON: Thank you, Mr. Krasnov.

(Time Noted: 12:23 p.m.)

VLADIMIR KRASNOV

Subscribed and sworn to before me
this ____ day of _____, 2008.

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C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF NEW YORK)

I, FRANCIS X. FREDERICK, a Notary Public within and for the State of New York, do hereby certify:

That VLADIMIR KRASNOV, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by the witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 27th day of October, 2008.

FRANCIS X. FREDERICK

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----- I N D E X -----

WITNESS	EXAMINATION BY	PAGE
VLADIMIR KRASNOV	MR. THOMPSON	4, 31
	MR. FRIEDMAN	14

----- INFORMATION REQUESTS -----

DIRECTIONS: NONE
RULINGS: NONE
TO BE FURNISHED: NONE
REQUESTS: NONE
MOTIONS: NONE

----- EXHIBITS -----

REGISTRANT	FOR ID.
Exhibit 138	
Amended Notice of Deposition of	
Vladimir Krasnov.....	4

1
2 NAME OF CASE: FOUR SEASONS v. IGS
3 DATE OF DEPOSITION: OCTOBER 20, 2008
4 NAME OF WITNESS: VLADIMIR KRASNOV

5 Reason codes:

- 6 1. To clarify the record.
- 7 2. To conform to the facts.
- 8 3. To correct transcription errors.

9 Page _____ Line _____ Reason _____
10 From _____ to _____

11 Page _____ Line _____ Reason _____
12 From _____ to _____

13 Page _____ Line _____ Reason _____
14 From _____ to _____

15 Page _____ Line _____ Reason _____
16 From _____ to _____

17 Page _____ Line _____ Reason _____
18 From _____ to _____

19 Page _____ Line _____ Reason _____
20 From _____ to _____

21 Page _____ Line _____ Reason _____
22 From _____ to _____

23 Page _____ Line _____ Reason _____
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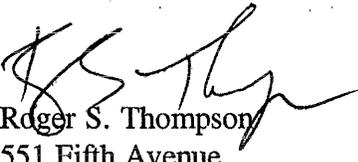
25 Page _____ Line _____ Reason _____
From _____ to _____

VLADIMIR KRASNOV

You are invited to attend and cross-examine.

Respectfully submitted,
COHEN, PONTANI, LIEBERMAN & PAVANE

By


Roger S. Thompson
551 Fifth Avenue
New York, New York 10176
(212) 687-2770

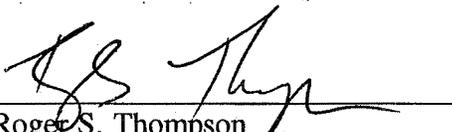
Attorneys for Registrant,
International Gold Star Trading Corp.

Dated: October 10, 2008

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a true and correct copy of the foregoing Notice of Deposition was served by first-class mail, postage pre-paid, and by e-mail on counsel for petitioner, addressed as follows:

Samuel Friedman, Esq.
samfriedman@verizon.net
225 Broadway, Suite 1804
New York, New York 10007


Roger S. Thompson
Counsel for Registrant

October 10, 2008
Date