



BULKY DOCUMENTS

(exceeds 300 pages)

Proceeding/Serial No: 92047661

Filed: 10-05-2007

Title: Petitioner's Motion to Compel Responses to
Petitioner's First Set of Interrogatories and Its First Set
of Requests for Production of Documents to Registrant
Saroj International

Part 1 of 1



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

In the matter of

TTAB

Registration No.: 3143997
For the mark: www.east13.com
Date registered: September 19, 2006

Registration No.: 3147241
For the mark: east13
Date registered: September 26, 2006

Registration No.: 3158549
For the mark: East Thirteen
Date registered: October 17, 2006

LIVE VENTURES INC.

PETITIONER,

v.

SAROJ INTERNATIONAL, INC.

REGISTRANT.

76632663

CANCELLATION No. 92047661

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

**PETITIONER'S MOTION TO COMPEL RESPONSES TO PETITIONER'S FIRST SET
OF INTERROGATORIES AND ITS FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO REGISTRANT SAROJ INTERNATIONAL.**



10-05-2007

Pursuant to 37 C.F.R. § 2.120(e), petitioner Live Ventures Inc. ("Petitioner" or "Live Ventures") hereby moves for an order compelling registrant Saroj International, Inc. ("Registrant" or "Saroj") to supplement its responses to PETITIONER'S FIRST SET OF INTERROGATORIES TO REGISTRANT SAROJ INTERNATIONAL ("Interrogatories") and PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO REGISTRANT SAROJ INTERNATIONAL ("Document Requests"). This motion is supported by the declaration of Norbert Stahl ("Stahl Dec"), filed herewith, which includes a statement of good faith effort to resolve the issues brought under this motion, and Exhibits A through Q attached to the Stahl Dec.

I. REGISTRANT FAILED TO SIGN SUPPLEMENTAL RESPONSES AND PETITIONER THEREFORE MOVES IN THE ALTERNATIVE.

Saroj served Responses to the Interrogatories and Document Requests on September 6, 2007. Stahl Dec, ¶13, Exs. C and D. These first Responses provided nothing – not a single substantive response, not a single document.

On September 20, 2007, Saroj provided Supplemental Responses to the Document Requests and Interrogatories as a pdf file attached to an email. Stahl Dec, ¶15, Exs. M and N. The Supplemental Responses were also deficient. Moreover, the Supplemental Responses were not signed by anyone – not by someone from Saroj and not by Saroj's counsel. The Certificates of Service attached to the Supplemental Responses were also not signed or dated by anyone.

By letter of September 27, 2007, Live Ventures notified Saroj of deficiencies in the Supplemental Responses and also requested signed copies thereof. Stahl Dec, ¶17, Ex. P. Live Ventures also requested signed copies by email on September 26,

2007. Stahl Dec, ¶16, Ex. O. Saroj never responded to the letter or the email in any way.

This motion therefore addresses the deficiencies of the first Responses and also the unsigned Supplemental Responses.

II. THE REGISTERED TRADEMARKS AT ISSUE.

This proceeding concerns three registered marks of Saroj, all filed under Section 1(a) of the Trademark Act, and which Live Venture seeks to cancel on the basis of fraud and prior use.

a. Leather Goods and Clothing Marks.

The applications for Registration Nos. 3143997 for “www.east13.com” (“997 mark”) and 3147241 for “east13” (“241 mark”) were filed on March 4, 2004 and both claim use of the marks under Section 1(a), both listing April 1, 2004 as the first use date and the first use in commerce date.

Saroj’s listings of goods under the ‘997 mark and the ‘241 mark are virtually identical (the only difference being that the ‘997 mark lists “teddies with garters belts” while the ‘241 mark lists “teddies with garters”). Saroj did not list any services for both marks. The listing of goods consists of 10 leather goods of International Class 18 and 35 clothing goods of International Class 25.

b. Advertising and Business Mark.

The application for Registration No. 3158549 for “East Thirteen” (“549 mark”) was filed on November 29, 2005 and claims use of the mark under Section 1(a) for “retail clothing boutiques” in International Class 35 for advertising and business

services. The '549 mark lists October 1, 2005 as the first use date and the first use in commerce date.

III. INTERROGATORIES.

a. Summary of Interrogatories.

Live Ventures served a first set of 39 interrogatories on Saroj on August 2, 2007.

Stahl Dec, Ex. A. The interrogatories are summarized as follows:

1. *Interrogatories Nos. 1-27:* All relevant facts and circumstances of Saroj's use of the three marks at issue for 27 types of goods and services (one per interrogatory) on or before the day Saroj filed the trademark applications. (The term "use" was defined in the Interrogatories as use in accordance with 15 U.S.C. § 1051(a). Stahl Dec, Ex. A, p. 3. As Section 1051(a) refers to use in "commerce", the definition of "commerce" as "all commerce which may lawfully be regulated by Congress" under 15 U.S.C. § 1127 is also implicated. The Interrogatories also use the definition of Section 1127 for "commerce." Stahl Dec, Ex. A, p. 3.) This is relevant, for example, because Live Ventures believes that Saroj committed fraud when it filed its Section 1(a) trademark applications that resulted in the marks at issue because Saroj listed goods and services that it had not used.

2. *Interrogatories Nos. 28-30:* All relevant facts and circumstances of Saroj's first use of the three marks at issue. This is relevant, for example, because the petition to cancel alleges first use by Live Ventures.

3. *Interrogatories Nos. 31-33:* Quarterly sales figures in commerce for all three marks at issue. This is relevant, for example, to determine if Saroj used the marks in commerce and to determine how substantial the use was.

4. *Interrogatories Nos. 34-39:* Persons who used Saroj's marks and, for anyone other than Saroj, to describe their use of the marks. This assists Live Ventures to evaluate the scope of use and to conduct follow up discovery.

b. Saroj's First Signed Interrogatory Responses.

In its first Responses, Saroj gave the *same response to all* Interrogatories, namely that Saroj was "unable to ascertain any information responsive to the interrogatory." Stahl Dec, Ex. C.

These responses are deficient. All interrogatories are directly pertinent to the trademarks for which Saroj obtained registration. Saroj alleged use of the marks in the Trademark Office, it cannot now maintain that it is "unable to ascertain any information" on that use.

Saroj must either know that it did not use the marks (contrary to what it stated in its trademark applications), or Saroj must know the relevant facts and circumstances of the use on or before filing the trademark applications (Nos. 1-27), the first use (Nos. 28-30), sales figures under the marks (Nos. 31-33), and who used the marks and how (Nos. 34-39).

Live Ventures thus moves the Board for an order that Saroj provide full and complete responses to Interrogatories 1-39.

c. Saroj's Unsigned Supplemental Interrogatory Responses.

Saroj's Supplemental Interrogatory Responses are unsigned. Stahl Dec, Ex. M. (Saroj failed to provide signed copies even after Live Ventures had asked twice. Stahl Dec, ¶¶17-18.) Even if the Supplemental Responses were properly signed and verified, they are deficient for the following reasons.

1. *Interrogatories Nos. 1-12, 14-25, 31, and 32:* Saroj again fails to answer these Interrogatories and merely states that it was "unable to ascertain any information responsive to the interrogatory." Stahl Dec, Ex. M.

Nos. 1-12 and 14-25 ask for all relevant facts and circumstances of Saroj's use of the '997 mark and the '241 mark for specific goods (one per interrogatory and all listed by Saroj in the relevant trademark applications) on or before the day Saroj filed its trademark applications. If Saroj did not use the marks for the goods in question, contrary to its position towards the Trademark Office, then it should say so. If it did use the marks for the goods, it must know the relevant facts and circumstances.

Nos. 31 and 32 ask quarterly sales figures in commerce for goods under the '997 mark and the '241 mark. Saroj must know what those figures are, even if it sold no goods under the marks and the sales figures are zero dollars.

Live Ventures therefore requests an order compelling Saroj to answer these interrogatories.

2. *Interrogatories Nos. 13, 26, and 27:* These interrogatories ask for all relevant facts and circumstances of Saroj's use of the '997 mark for denim jeans (No. 13), the '241 mark for denim jeans (No. 26), and the '549 mark for retail clothing

boutiques (No. 27). Saroj gives the same response for Nos. 13 and 26 regarding alleged efforts by Saroj to “create accessories and tags for denim line” (Stahl Dec, Ex. M, pp. 9, 15) but Saroj nowhere states if it used the marks in question on or in connection with any denim jeans. Saroj’s response to No. 27 is also cursory.

Live Ventures asked Saroj in meet and confer that Saroj either supplement the responses to Nos. 13, 26 and 27, or that Saroj confirm that its responses contain everything Saroj intends to rely on for its allegation that it used the marks. Stahl Dec, ¶18, Ex. P. Saroj has failed to respond to Live Venture’s request and Live Ventures thus moves for an order compelling that Saroj supplement the responses or confirm that the responses contain all information that Saroj relies on.

3. *Interrogatories Nos. 28-30:* These interrogatories ask for all relevant facts and circumstances of Saroj’s **first** use of the three trademarks at issue. Saroj redrafted the interrogatories by deleting the word “first” and consequently failed to respond to the interrogatories posed. Instead, Saroj provides no dates of use, let alone first use, in response to Nos. 28 and 29 (*i.e.*, first use of ‘997 mark and ‘241 mark) (Stahl Dec, Ex. M, pp. 16-17). For No. 30, Saroj provides dates and mentions “orders for merchandise” but failed to provide any information to show that the alleged activity constituted use under Section 1051(a) in commerce under Section 1127, *supra*. (Stahl Dec, Ex. M, p. 18.)

Live Ventures therefore requests an order compelling Saroj to provide complete answers to these interrogatories.

4. *Interrogatory No. 33:* This interrogatory asks for quarterly sales figures in commerce under Section 1127 for goods under the '549 mark. Saroj provided sales figures but Live Ventures asked Saroj in meet and confer to confirm that the sales figures are in commerce under Section 1127. Stahl Dec, ¶18, Ex. P. Saroj has failed to respond to Live Venture's meet and confer request and Live Ventures thus moves for an order compelling that Saroj provide the requested confirmation of use in commerce under Section 1127.

IV. DOCUMENT REQUESTS.

a. Summary of Document Requests at Issue.

Live Ventures served a first set of 148 document requests on Saroj on August 2, 2007. Stahl Dec, Ex. B. The Document Requests at issue here are as follows:

1. *Requests Nos. 1-3:* Documents sufficient to show date and nature of the first use of the marks for all listed goods and services. (The term "use" was defined in the Document Requests as use in accordance with 15 U.S.C. § 1051(a). Stahl Dec, Ex. B, p. 3. As Section 1051(a) refers to use in "commerce", the definition of "commerce" as "all commerce which may lawfully be regulated by Congress" under 15 U.S.C. § 1127 is also implicated. The Document Requests also use the definition of Section 1127 for "commerce." Stahl Dec, Ex. B, p. 3.)

2. *Requests Nos. 4-6:* Documents sufficient to show volume of sales in commerce for goods and services under the marks for all listed goods and services.

3. *Requests Nos. 7-9:* Documents sufficient to show nature and frequency of use of the marks for all listed goods and services on and before the date Saroj filed its trademark applications.

4. *Requests Nos. 10-100:* Documents sufficient to show use of the marks for all listed goods and services (one per request) on and before the date Saroj filed its trademark applications.

5. *Requests Nos. 102-107:* Documents to identify persons to whom Saroj has offered, sold, or supplied goods under the '997 mark and the '241 mark.

6. *Requests Nos. 108-110:* Documents related to advertising of goods or services under the marks in issue.

7. *Requests Nos. 111-131:* Documents related to the pleadings in this proceeding.

8. *Requests Nos. 135-137, 141-143, 145-147:* Documents related to agreements, ventures, plans, marketing related to the marks in issue.

b. Saroj's Document Production.

Saroj's entire document production consists of 174 pages. Stahl Dec, ¶15. These 174 pages are deficient for the following reasons:

1. *Requests Nos. 1-3 re First Use:*

The 174 pages include no documents showing the date and nature of the first use of the marks at issue.

2. *Requests Nos. 4-6 re Volume of Sales:*

The 174 pages include no documents showing the volume of sales in commerce for goods and services under the marks at issue.

3. *Requests Nos. 7-9 re Nature and Frequency of Use:*

The 174 pages include no documents showing the nature and frequency of use of the marks at issue.

4. *Requests Nos. 10-100 re Use for Each of Listed Goods and Services:*

The 174 pages include no documents showing use of the marks at issue for each of the listed goods and services on or before the day Saroj filed its trademark applications.

5. *Requests Nos. 102-107 re Offers, Sales, Supplies:*

The 174 pages include no documents identifying any person to whom Saroj offered, sold, or supplied in commerce goods under the '997 mark and the '241 mark.

6. *Requests Nos. 108-109 re Advertising:*

The 174 pages include no documents related to advertising in commerce of goods under the '997 mark and the '241 mark.

7. *Requests Nos. 111-131 re the Pleadings:*

The 174 pages include some documents related to allegations in the pleadings and Live Ventures has asked Saroj to confirm that it has produced everything. Saroj has not responded. Stahl Dec, ¶18.

8. *Requests Nos. 135-137, 141-143, 145-147 re Agreements, Ventures, Plans, Marketing:*

The 174 pages include no documents related to agreements, ventures, plans, and marketing related to the marks in issue.

c. Saroj's First Signed Document Request Responses Are Deficient.

Saroj agreed to produce documents in response to 1 Document Request – 1 out of 148. That 1 Document Request was Request No. 139 seeking a copy of Saroj's website.

Saroj responded to 138 Document Requests that it was “unable to locate any item responsive to the Request.” Stahl Dec, Ex. D. These 138 Document Requests are Requests Nos. 1-3, 7-105, 108-137, 140-144, and 148.

Saroj responded to Document Requests Nos. 4-6, 106, 107, 145-147 that it will produce responsive documents only under a Protective Order; and Saroj responded to Request No. 138 that it sought “privileged and/or confidential” documents “not subject to discovery.”

Saroj’s first Document Request Responses are deficient as they only agree to produce a copy of Saroj’s website and nothing else.

Saroj’s allegation that it was “unable to locate any item responsive to” Document Requests Nos. 1-3, 7-105, 108-137, 140-144, and 148 is not credible. Stahl Dec, Ex. D. If Saroj has no possession, custody or control of any responsive documents, then it should state that in its response. Yet, “unable to locate” is apparently a tool to produce nothing now, while trying to maintain the option to produce and/or use responsive documents at a later time and at the prejudice of Live Ventures. Saroj should not be permitted to withhold discovery to prejudice Live Ventures.

Saroj’s position that it will produce documents under a Protective Order in response to Requests Nos. 4-6, 106, 107, 145-147 is clearly in bad faith. Live Ventures provided Saroj’s counsel, Mr. Eastman, with a signed Protective Order on September 10, 2007, but Mr. Eastman never executed the Protective Order for Saroj and Saroj never produced the allegedly confidential documents. Stahl Dec, ¶5, Ex. F.

Saroj also stated in its responses to all Document Requests that Saroj will “honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall

provide such supplemental Responses when appropriate.” Stahl Dec, Ex. D, *e.g.*, p. 5. Live Venture submits that Saroj’s position is *not* taken in good faith. While the Federal Rules of Civil Procedure allow, and in fact *require*, supplementation, they do not allow a party to withhold discovery so it may “find it” later and thereby prejudice the other side. According to Saroj’s responses (and in light of its production of 174 pages), Saroj has virtually nothing on paper (or other document format) – no shipping documents, no purchase agreements, no sales documents, no documents that show that Saroj used the marks, when it used them, etc. Live Ventures therefore asks that Saroj produce all responsive documents or that it affirm that it has nothing. Saroj should not be permitted to withhold documents now and produce them later to surprise and prejudice Live Ventures.

Saroj’s first Document Request Responses are thus deficient and in bad faith. Live Ventures therefore requests an order compelling Saroj to provide complete answers to the Document Requests.

c. Saroj’s *Unsigned* Supplemental Document Request Responses.

Saroj’s Supplemental Document Request Responses are unsigned. Stahl Dec, Ex. N. (Saroj failed to provide signed copies even after Live Ventures had asked twice. Stahl Dec, ¶¶17-18.) Even if the Supplemental Responses were properly signed and verified, they are deficient for the following reasons.

Like the first Responses, the Supplemental Document Request Responses seek to withhold discovery while trying to maintain the option to produce the documents at a later time, and thus prejudice Live Ventures. Saroj responds to 123 out of the total of 148 Document Requests that “it appears no such documents exist.” Stahl Dec, Ex. N,

e.g., p. 6. (Those 123 Requests are Requests Nos. 4, 5, 7, 8, 10-99, 101, 103, 105-109, 114-116, 118-121, 123, 127, 130, 131, 135-137, 140-147.) Just like it did in its first Responses, Saroj maintains that it will “honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.” Stahl Dec, Ex. N, e.g., p. 6.

For Document Requests Nos. 1-3, 6, 9, 100, 102, 104, 111-113, 117, 122, 124-126, 128, 129, the Supplemental Document Request Responses point to the 174 pages Saroj has produced. As discussed above in the section “Saroj’s Document Production” for all of these Requests, the 174 pages Saroj produced do not provide documents responsive to these requests.

As discussed for the first, signed Responses, Saroj should not be permitted to withhold discovery and produce it when Saroj deems such production best suited to its needs. If Saroj has no responsive documents in its possession, custody or control, then it must state that and not be allowed to introduce documents later on in these proceedings that it failed to produce now.

Live Ventures thus requests an order compelling complete production of documents responsive to Requests Nos. 1-100, 102-131, 135-137, 141-143 and 145-147.

V. RELIEF SOUGHT.

a. Interrogatories.

Live Ventures requests that Saroj provide *either* of the following relief:

1. *Saroj Continues Its Failure to Sign Supplementation:*

Saroj should be ordered to provide complete supplemental responses to Interrogatories Nos. 1-39.

2. *Saroj Provides Signed Copy of its Supplementation:*

Saroj should be ordered to further supplement its responses to Interrogatories Nos. 1-33.

b. Document Requests.

Live Ventures requests that Saroj provide either of the following relief:

1. *Saroj Continues Its Failure to Sign Supplementation:*

Saroj should be ordered to provide complete supplemental responses to Document Requests Nos. 1-138, 140-148.

2. *Saroj Provides Signed Copy of its Supplementation:*

Saroj should be ordered to further supplement its responses to Document Requests Nos. 1-100, 102-131, 135-137, 141-143 and 145-147.

Respectfully submitted,

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Date: October 5, 2007

Correspondence Address:

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S MOTION TO COMPEL RESPONSES TO PETITIONER'S FIRST SET OF INTERROGATORIES AND ITS FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO REGISTRANT SAROJ INTERNATIONAL has been served on Gary L. Eastman, Esq., Attorney for Registrant Saroj International, Inc., by mailing said copy on October 5, 2007, via First Class Mail, postage prepaid, to: Gary L. Eastman, APLC, 707 Broadway Street, Suite 1800, San Diego, California 92101.

Date: October 5, 2007

Stahl Law Firm



Norbert Stahl, Esq.
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of

Registration No.: 3143997
For the mark: www.east13.com
Date registered: September 19, 2006

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REGISTRANT.

CANCELLATION No. 92047661

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

**DECLARATION OF NORBERT STAHL, INCLUDING STATEMENT OF GOOD FAITH
EFFORT, IN SUPPORT OF PETITIONER'S MOTION TO COMPEL RESPONSES TO
PETITIONER'S FIRST SET OF INTERROGATORIES AND ITS FIRST SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS TO REGISTRANT SAROJ
INTERNATIONAL**

I, Norbert Stahl, declare as follows:

1. I am an attorney licensed to practice in the State of California and registered to practice before the United States Patent and Trademark Office and I am a member of Stahl Law Firm. I represent Petitioner Live Ventures Inc. (petitioner or "Live Ventures") in Cancellation No. 92047661 and I submit this declaration and statement of good faith effort in support of Petitioner's Motion to Compel Responses to Petitioner's First Set of Interrogatories and its First Set of Requests for Production of Documents to Registrant Saroj International, Inc. I make this declaration based on my personal knowledge and could and would competently testify thereto if called as a witness.

2. On August 2, 2007, I served Petitioner's First Set of Interrogatories to Registrant Saroj International ("Interrogatories") and Petitioner's First Set of Requests for Production of Documents and Things to Registrant Saroj International ("Document Requests") on counsel of record for Registrant. Attached as Exhibit A is a true and correct copy of the Interrogatories. Attached as Exhibit B is a true and correct copy of the Document Requests.

3. On September 6, 2007, Registrant served by First Class Mail a Response to the Interrogatories ("Interrogatory Responses") and a Response to the Document Requests ("Document Request Responses"). Attached as Exhibit C is a true and correct copy of the Interrogatory Responses. Attached as Exhibit D is a true and correct copy of the Document Request Responses.

4. On September 7, 2007, counsel of record for Registrant, Mr. Gary Eastman ("Mr. Eastman"), faxed a letter to me, stating that Registrant's "principal ... was out of the country for most of the month of August" and that Registrant's "investigation is ongoing and each of the Responses will likely be supplemented." Attached as Exhibit E is a true and correct copy of the letter of September 7, 2007, of Mr. Eastman to me.

5. On September 10, 2007, I sent by facsimile a letter to Mr. Eastman with respect to document requests numbers 4-6, 106, 107, 145-147, to which Registrant responded that it was withholding documents it considered confidential because no Protective Order was in place. Enclosed with the letter I faxed to Mr. Eastman a standard stipulated Protective Order of the Trademark Trial and Appeal Board for this proceeding that I had signed for Live Ventures. In the letter I asked Mr. Eastman to sign the Protective Order for Registrant and to produce all documents that Registrant was withholding on the grounds that no Protective Order was in place. Until today, I have not received a copy of the Protective Order executed by Mr. Eastman, or anyone else on Registrant's behalf, and I have not received any documents that Registrant designated as confidential. Attached as Exhibit F is a true and correct copy of the letter of September 10, 2007, from me to Mr. Eastman.

6. On September 10, 2007, I called Mr. Eastman and asked when Live Ventures would receive complete responses to the Interrogatories and Document Requests. Mr. Eastman did not answer my question but said that he would give me the answer to my inquiry by noon of September 12, 2007. I agreed to wait until noon of

September 12, 2007, but I informed Mr. Eastman that Live Ventures would soon file a motion to compel absent quick and complete supplementation of Registrant's responses because Registrant had only provided objections and had failed to provide any substantive responses or discovery whatsoever. I also asked Mr. Eastman on what days in August 2007 the principal of Saroj was out of the country but Mr. Eastman could not answer that question.

7. On September 12, 2007, Mr. Eastman called me and told me that Live Ventures would have complete responses to the Interrogatories and Document Requests delivered to the offices of Stahl Law Firm in San Carlos, California, by Federal Express on September 14, 2007.

8. On September 13, 2007, Mr. Eastman called my offices at 5:29 p.m. and left a voice mail. In the voice mail, Mr. Eastman said that he knew that he promised the complete discovery responses for delivery on September 14, 2007, but that he had missed the deadline for Federal Express pick-up. Mr. Eastman further said that he understood that Live Ventures wanted to move to compel discovery responses and that he appreciated my patience, but Mr. Eastman asked to be contacted again on September 14, 2007, before Live Ventures would file a motion to compel. Mr. Eastman further said in the voice mail that he would send the complete responses by Federal Express on September 14, 2007 for delivery on Saturday, September 15, 2007, or on Monday, September 17, 2007, whichever I preferred.

9. On September 14, 2007, I called Mr. Eastman at his office number and left a voice message in which I said that Live Ventures would wait to receive the

complete discovery responses by Federal Express on Monday, September 17, 2007, and that Live Ventures would not file a motion to compel before then.

10. On September 17, 2007, I called Mr. Eastman and inquired about the supplementation of Registrant's responses to the Interrogatories and the Document Requests that Mr. Eastman had promised for Federal Express delivery no later than Monday, September 17, 2007. Mr. Eastman said that he had not sent any supplementation of Registrant's Interrogatory Responses and Document Request Responses in any way. I asked Mr. Eastman when Live Ventures would receive the complete responses to the Interrogatories and Document Requests. Mr. Eastman said that he would email pdf files of the fully supplemented responses by 5 p.m. on September 17, 2007, and would send the responses and any documents for production by Federal Express for delivery on September 18, 2007. At 3:01 p.m. on September 17, 2007, and after the call, I confirmed Mr. Eastman's representations during the call in an email to Mr. Eastman, in which I also confirmed that Live Ventures would move for an order compelling the outstanding discovery. Attached as Exhibit G is a true and correct copy of the email of 3:01 p.m. on September 17, 2007, from me to Mr. Eastman.

11. On September 17, 2007, at 5:40 p.m., I received an email from Mr. Eastman with a tracking number for a Federal Express shipment with documents from Registrant for production. The email did not include pdf files for supplemental responses by Registrant, contrary to what Mr. Eastman had promised earlier that day. Instead, Mr. Eastman's email only stated that he would forward those response "upon receipt" from Registrant but did not give any indication when that would be. Attached

as Exhibit H is a true and correct copy of the email of 5:40 p.m. on September 17, 2007, from Mr. Eastman to me.

12. On September 17, 2007, at 7:15 p.m., I sent an email to Mr. Eastman confirming that we had not received pdf files of any supplemental responses to Live Ventures discovery requests from Registrant, contrary to Mr. Eastman's representations that we would receive such pdf files by 5 p.m. on that day. The email further informed Mr. Eastman that we were moving forward with a motion to compel. Attached as Exhibit I is a true and correct copy of the email of 7:15 p.m. on September 17, 2007, from me to Mr. Eastman.

13. On September 18, 2007, at 10:04 a.m., I received an email from Mr. Eastman in which Mr. Eastman misrepresents the telephone conversation from September 17, 2007. According to Mr. Eastman's email, the supplemental responses would only have to be made available "upon receipt" of the responses by Mr. Eastman from Saroj International, Inc. and not by any deadline. That statement is false. The email also states that the supplemental responses "should be" provided to Live Ventures "no later than close of business" on September 18, 2007. Attached as Exhibit J is a true and correct copy of the email of 10:04 a.m. on September 18, 2007, from Mr. Eastman to me.

14. On September 18, 2007, at 10:23 a.m., I sent an email to Mr. Eastman pointing out that Mr. Eastman's prior email misrepresents the facts. Attached as Exhibit K is a true and correct copy of the email of 10:23 a.m. on September 18, 2007, from me to Mr. Eastman.

15. On September 18, 2007, I received a Federal Express delivery from Mr. Eastman with 174 pages of documents from Saroj. Until now, I have not received any further production of documents or materials from Saroj.

16. On September 20, 2007, at 8:04 p.m., I received an email from Mr. Eastman with pdf files of supplemental responses to Live Ventures discovery requests, including a First Supplemental Response to the Interrogatories ("Supplemental Interrogatory Responses") and a First Supplemental Response to the Document Requests ("Supplemental Document Request Responses"). The email also included tif files that Mr. Eastman represented as including "Certification pages" for the supplemental responses. The email further represented that the "original documents" of the supplemental responses "have been placed in the mail" for Live Ventures. Attached as Exhibit L is a true and correct copy of the email of 8:04 p.m. on September 20, 2007, from Mr. Eastman to me. Attached as Exhibit M is a true and correct copy of a printout of the pdf file of the Supplemental Interrogatory Responses attached to the email of 8:04 p.m. on September 20, 2007, from Mr. Eastman to me. Attached as Exhibit N is a true and correct copy of a printout of the pdf file of the Supplemental Document Request Responses attached to the email of 8:04 p.m. on September 20, 2007, from Mr. Eastman to me.

17. On September 26, 2007, at 10:23 a.m., I sent an email to Mr. Eastman stating that I did not receive by mail any originals or any copies of the alleged supplemental responses. I also pointed out in the email that I could not open the tif files with the alleged Certification pages and I requested that Mr. Eastman email pdf

versions of the signature pages for the supplemental responses and the proofs of service. Mr. Eastman never responded to this email in any way and has never provided any of the requested documentation in any form. Attached as Exhibit O is a true and correct copy of the email of 10:23 a.m. on September 26, 2007, from me to Mr. Eastman.

18. On September 27, 2007, I sent by facsimile and by email a letter to Mr. Eastman, which specified various deficiencies in Registrant's Supplemental Interrogatory Responses and Supplemental Document Request Responses in light of the documents labeled 0001-0174 that Registrant produced. The letter demanded that Registrant cure those deficiencies by October 4, 2007. The letter also demanded that Registrant provide signed copies of the supplemental responses. Until today, I have not received any response or reaction of any kind to my letter of September 27, 2007 from Mr. Eastman, or anyone else on Registrant's behalf. Attached as Exhibit P is a true and correct copy of the letter of September 27, 2007, from me to Mr. Eastman.

19. On October 4, 2007, at 10:51 a.m., I sent an email to Mr. Eastman pointing out that I had not received any response to my letter of September 27, 2007, and that we also did not receive signed and verified supplemental responses to Live Venture's discovery requests. Attached as Exhibit Q is a true and correct copy of the email of 10:51 a.m. on October 4, 2007, from me to Mr. Eastman.

20. I believe that I made a good faith effort, by conference or correspondence, to resolve with Registrant or Registrant's attorney the issues presented in the motion filed herewith but I have been unable to reach agreement. Due to Registrant's failure to

cooperate in discovery and its failure to respond at all at this stage, Live Ventures is left with no choice but to bring the motion to compel filed herewith.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed in San Carlos, California, on October 5, 2007.

By  _____

Norbert Stahl
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing DECLARATION OF NORBERT STAHL, INCLUDING STATEMENT OF GOOD FAITH EFFORT, IN SUPPORT OF PETITIONER'S MOTION TO COMPEL RESPONSES TO PETITIONER'S FIRST SET OF INTERROGATORIES AND ITS FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO REGISTRANT SAROJ INTERNATIONAL, including Exhibits A through Q thereto, has been served on Gary L. Eastman, Esq., Attorney for Registrant Saroj International, Inc., by mailing said copy on October 5, 2007, via First Class Mail, postage prepaid, to: Gary L. Eastman, APLC, 707 Broadway Street, Suite 1800, San Diego, California 92101.

Date: October 5, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT A

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

In the matter of

Registration No.: 3143997
For the mark: www.east13.com
Date registered: September 19, 2006

Registration No.: 3147241
For the mark: east13
Date registered: September 26, 2006

Registration No.: 3158549
For the mark: East Thirteen
Date registered: October 17, 2006

LIVE VENTURES INC.

PETITIONER,

v.

SAROJ INTERNATIONAL, INC.

REGISTRANT.

CANCELLATION No. 92047661

**PETITIONER'S FIRST SET OF INTERROGATORIES
TO REGISTRANT SAROJ INTERNATIONAL**

Pursuant to Federal Rule of Civil Procedure 33 and 37 C.F.R. § 2.120(d)(1), petitioner Live Ventures Inc. ("Petitioner") hereby requests that registrant Saroj International, Inc. ("Registrant") through one or more authorized officers or agents of Registrant, and in compliance with the definitions and instructions herein, answer separately and under oath the interrogatories set forth below within thirty (30) days after the service of the interrogatories.

DEFINITIONS

1. "REGISTRANT," "YOU" or "YOUR" means Saroj International, Inc., registrant and owner of U.S. Trademark Registration Nos. 3143997, 3147241, and 3158549, and any person or entity that has used or uses any one or more of the trademarks under U.S. Trademark Registration Nos. 3143997, 3147241, and 3158549 with authorization from Saroj International, Inc.

2. "PETITIONER" means Live Ventures Inc., petitioner in the captioned cancellation proceeding.

3. "997 MARK" means the trademark WWW.EAST13.COM under U.S. Trademark Registration No. 3143997.

4. "997 REGISTRATION" means U.S. Trademark Registration No. 3143997.

5. "241 MARK" means the trademark EAST13 under U.S. Trademark Registration No. 3147241.

6. "241 REGISTRATION" means U.S. Trademark Registration No. 3147241.

7. "549 MARK" means the trademark EAST THIRTEEN under U.S. Trademark Registration No. 3158549.

8. "549 REGISTRATION" means U.S. Trademark Registration No. 3158549.

9. "PETITION" means the Petition to Cancel filed by Petitioner in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

10. "ANSWER" means the Answer filed by REGISTRANT in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

11. "USE," when employed with reference to a trademark, means the use of the trademark in accordance with 15 U.S.C. § 1051(a).

12. "COMMERCE," when employed with reference to a trademark or products under a trademark, means commerce in accordance with 15 U.S.C. § 1127.

13. "USE IN COMMERCE," when employed with reference to a trademark or products under a trademark, means use in commerce in accordance with 15 U.S.C. § 1127.

14. "NATURE" of use of a trademark means how the trademark was used, e.g., was the trademark used on a product, in a brochure, in a website, in a letter, or in any other way.

15. "DATE" of use of a trademark means the day, month and year of the use, or as much of that information as possible.

16. "VOLUME OF SALES" means the dollar amount of sales, *i.e.*, how much was billed for the sales and how much was paid for the sales; also the number of goods sold, *e.g.*, the number of each of the goods listed on the trademark registration inquired about.

17. "ALL RELEVANT FACTS AND CIRCUMSTANCES," when employed with reference to the USE of a trademark, means all information that is relevant to evaluating the USE of the trademark.

18. "And" and "or" shall be construed conjunctively or disjunctively, whichever makes the requests more inclusive. The term "all" shall mean "any and all," and the term "any" shall mean "any and all." The singular of any word or phrase shall include the plural of such word or phrase, and the plural of any word or phrase shall include the singular of such word or phrase.

19. The terms "DOCUMENTS," "WRITINGS" or "RECORDINGS" as used herein are used in their broadest sense and include, without limitation, any type of written, recorded, electronic, graphic or photographic matter of any kind or character, however produced or reproduced, including but not limited to all photographs, sketches, drawings, videotapes, audiotapes, letters, telegrams, telexes, facsimiles, electronic mail, correspondence, brochures, manuals, press releases, transcripts of interviews, transcripts of speeches, product guides, contracts, consulting agreements, other agreements, business plans, deeds, drafts, workpapers, plans, blueprints, specifications, comparisons, surveys, data sheets, analyses, calculations, files (and their contents), notes to the files, reports, publications, mechanical and electronic sound recordings or transcripts thereof, calendar or diary entries, memoranda of telephone or personal conversations or of meetings or conferences, maps, studies, reports, charts, inter-office communications, minutes of meetings, articles, announcements, ledgers, vouchers, checks, receipts and invoices.

20. The term "COMMUNICATION" shall mean any oral or written transmittal, correspondence, and/or receipt of words or information, whether such was by chance, pre-arranged, formal or informal, including but not limited to conversations in person, telephone conversations, telegrams, telexes, facsimiles, letters, emails, reports or

memoranda, formal statements, newspaper stories, notes of telephone conversations, notes of meetings, data compilations, and electronically stored data.

21. The terms "PERSON" or "PEOPLE" include any natural person, firm, association, organization, partnership, business, trust, corporation, or public entity.

22. The terms "RELATE" or "REFER" mean directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon any one or more subject matters described in the discovery request.

23. The terms "IDENTIFY" or "IDENTITY" when used in connection with an individual means: state the individual's full name; his or her home and business address; his or her present employer; his or her position, title, or job description; and, if employed by you, the individual's dates and regular places of employment, and general duties.

24. The terms "IDENTIFY" or "IDENTITY" when used in connection with a company, corporation, association, partnership, joint venture, or any legal entity other than a natural person means: state its full name and type of organization or entity; the address of its principal place of business; its date and place of incorporation; and identify its officers, directors, and managing agents.

25. The use of any verb in any tense shall be construed as the use of that verb in all tenses to the extent that so doing will include information which would otherwise be excluded.

26. In these requests, (i) the use of a word in its singular form shall be deemed to include its use in the plural form as well, and *vice versa*, and (ii) "any" includes "all," and *vice versa*.

27. The use of any verb in any tense shall be construed as the use of that verb in all tenses to the extent that so doing will include information which would otherwise be excluded.

INSTRUCTIONS

A. Where knowledge or information in YOUR possession is requested, the request extends to knowledge or information in the possession of YOUR predecessors and/or successors, as well as to information in the possession of YOUR officers, directors, agents, employees, servants, representatives and, unless privileged, attorneys. Whenever an answer to these interrogatories contains information that is not based upon YOUR personal knowledge, state the source and the nature of such information.

B. In the event REGISTRANT claims that an interrogatory is overly broad, REGISTRANT shall respond to that portion of the interrogatory which it deems unobjectionable and specifically identify the respect in which the interrogatory is allegedly overly broad.

C. In the event REGISTRANT claims that an interrogatory is unduly burdensome, REGISTRANT shall respond to that portion of the interrogatory which is unobjectionable and specifically identify the respect in which the interrogatory is allegedly unduly burdensome.

D. With respect to any information that REGISTRANT is unwilling to provide because the information is asserted to be immune from discovery under the attorney

client privilege or work product immunity, state separately with respect to such information:

(1) the general nature of the information (i.e., whether it is a letter, memorandum, report, pamphlet, etc.);

(2) the date on which such information was created, reproduced or transcribed;

(3) the name of the person who created, located, or identified such information and the name of each such person who has edited, corrected, revised, or amended the same;

(4) the name of each person to whom such information was given, shown, or sent, or otherwise known to REGISTRANT as being intended or actual recipient of a copy thereof,

(5) the name of the person having possession, custody, or control of any document or tangible thing comprising, recording or containing such information (or any copy thereof);

(6) a brief indication of the subject matter of such information;

(7) the grounds for the claimed privilege or immunity as to each such information;

(8) for each person identified in items c-e, an indication of whether such person is an attorney and was acting as an attorney in connection with his being associated with such information; and

(9) the interrogatory to which the information is responsive.

To the extent that an interrogatory concerns both privileged and unprivileged material, the unprivileged material shall be disclosed to the fullest extent possible without disclosing the privileged material.

E. If YOU cannot answer any interrogatory fully and completely after exercising due diligence to make inquiry and secure the information necessary to do so, please so state and answer each such interrogatory to the fullest extent YOU deem possible, specify the portion of each interrogatory that YOU claim to be unable to answer fully and completely, state the facts upon which YOU rely to support YOUR contention that YOU are unable to answer the interrogatory fully and completely, and state what knowledge, information and belief YOU have concerning the unanswered portion of such interrogatory.

F. These interrogatories shall be deemed continuing, and any additional information included in any way in these interrogatories that REGISTRANT identifies, acquires, or creates subsequent to the date of responding to these interrogatories, and up to and including the time of trial, shall be furnished to PETITIONER in accordance with Fed. R. Civ. P. 26(e) as supplemental responses to these interrogatories promptly after such information is identified, acquired or created.

G. The capitalization of words is used only as an aid and is not required for application of the definitions set out above.

INTERROGATORIES

INTERROGATORY NO. 1:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for backpacks prior to March 5, 2005.

INTERROGATORY NO. 2:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for wallets prior to March 5, 2005.

INTERROGATORY NO. 3:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for t-shirts prior to March 5, 2005.

INTERROGATORY NO. 4:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for swimwear prior to March 5, 2005.

INTERROGATORY NO. 5:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for socks prior to March 5, 2005.

INTERROGATORY NO. 6:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for shoes prior to March 5, 2005.

INTERROGATORY NO. 7:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for hats prior to March 5, 2005.

INTERROGATORY NO. 8:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for scarves prior to March 5, 2005.

INTERROGATORY NO. 9:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for coats prior to March 5, 2005.

INTERROGATORY NO. 10:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for jackets prior to March 5, 2005.

INTERROGATORY NO. 11:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for rainwear prior to March 5, 2005.

INTERROGATORY NO. 12:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for gloves prior to March 5, 2005.

INTERROGATORY NO. 13:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for denim jeans prior to March 5, 2005.

INTERROGATORY NO. 14:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for backpacks prior to March 5, 2005.

INTERROGATORY NO. 15:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for wallets prior to March 5, 2005.

INTERROGATORY NO. 16:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for t-shirts prior to March 5, 2005.

INTERROGATORY NO. 17:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for swimwear prior to March 5, 2005.

INTERROGATORY NO. 18:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for socks prior to March 5, 2005.

INTERROGATORY NO. 19:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for shoes prior to March 5, 2005.

INTERROGATORY NO. 20:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for hats prior to March 5, 2005.

INTERROGATORY NO. 21:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for scarves prior to March 5, 2005.

INTERROGATORY NO. 22:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for coats prior to March 5, 2005.

INTERROGATORY NO. 23:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for jackets prior to March 5, 2005.

INTERROGATORY NO. 24:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for rainwear prior to March 5, 2005.

INTERROGATORY NO. 25:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for gloves prior to March 5, 2005.

INTERROGATORY NO. 26:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for denim jeans prior to March 5, 2005.

INTERROGATORY NO. 27:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 549 MARK for retail clothing boutiques prior to November 30, 2005.

INTERROGATORY NO. 28:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR first USE of the 997 MARK.

INTERROGATORY NO. 29:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR first USE of the 241 MARK.

INTERROGATORY NO. 30:

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR first USE of the 549 MARK.

INTERROGATORY NO. 31:

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 997 MARK.

INTERROGATORY NO. 32:

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 241 MARK.

INTERROGATORY NO. 33:

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, under the 549 MARK.

INTERROGATORY NO. 34:

IDENTIFY all PERSONS that have ever USED the 997 MARK.

INTERROGATORY NO. 35:

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 34, describe the USE of the 997 MARK by such PERSON.

INTERROGATORY NO. 36:

IDENTIFY all PERSONS that have ever USED the 241 MARK.

INTERROGATORY NO. 37:

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 36, describe the USE of the 241 MARK by such PERSON.

INTERROGATORY NO. 38:

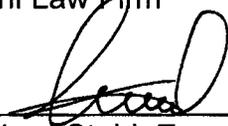
IDENTIFY all PERSONS that have ever USED the 549 MARK.

INTERROGATORY NO. 39:

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 38, describe the USE of the 549 MARK by such PERSON.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S FIRST SET OF INTERROGATORIES TO REGISTRANT SAROJ INTERNATIONAL has been served on Gary L. Eastman, Esq., Attorney for Registrant Saroj International, Inc., by mailing said copy on August 2, 2007, via First Class Mail, postage prepaid, to: Gary L. Eastman, APLC, 707 Broadway Street, Suite 1800, San Diego, California 92101.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT B

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

In the matter of

Registration No.: 3143997
For the mark: www.east13.com
Date registered: September 19, 2006

Registration No.: 3147241
For the mark: east13
Date registered: September 26, 2006

Registration No.: 3158549
For the mark: East Thirteen
Date registered: October 17, 2006

LIVE VENTURES INC.

PETITIONER,

v.

SAROJ INTERNATIONAL, INC.

REGISTRANT.

CANCELLATION No. 92047661

**PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS AND THINGS TO REGISTRANT SAROJ INTERNATIONAL**

Pursuant to Federal Rule of Civil Procedure 34 and 37 C.F.R. § 2.120(d)(2), petitioner Live Ventures Inc. ("Petitioner") hereby requests that registrant Saroj International, Inc. ("Registrant") produce the following documents and things for inspection and copying within thirty (30) days after the service of the requests for production of documents and things at the place where the documents and things are usually kept or at the offices of Stahl Law Firm, 2 Meadowsweet Ln, San Carlos, California 94070.

DEFINITIONS

1. "REGISTRANT," "YOU" or "YOUR" means Saroj International, Inc., registrant and owner of U.S. Trademark Registration Nos. 3143997, 3147241, and 3158549.
2. "PETITIONER" means Live Ventures Inc., petitioner in the captioned cancellation proceeding.
3. "997 MARK" means the trademark WWW.EAST13.COM under U.S. Trademark Registration No. 3143997.
4. "997 REGISTRATION" means U.S. Trademark Registration No. 3143997.
5. "241 MARK" means the trademark EAST13 under U.S. Trademark Registration No. 3147241.
6. "241 REGISTRATION" means U.S. Trademark Registration No. 3147241.
7. "549 MARK" means the trademark EAST THIRTEEN under U.S. Trademark Registration No. 3158549.
8. "549 REGISTRATION" means U.S. Trademark Registration No. 3158549.

9. "PETITION" means the Petition to Cancel filed by Petitioner in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

10. "ANSWER" means the Answer filed by REGISTRANT in Cancellation No. 92047661 in the U.S. Patent and Trademark Office.

11. "USE," when employed with reference to a trademark, means the use of the trademark in accordance with 15 U.S.C. § 1051(a).

12. "COMMERCE," when employed with reference to a trademark or products under a trademark, means commerce in accordance with 15 U.S.C. § 1127.

13. "USE IN COMMERCE," when employed with reference to a trademark or products under a trademark, means use in commerce in accordance with 15 U.S.C. § 1127.

14. "NATURE" of use of a trademark means how the trademark was used, e.g., was the trademark used on a product, in a brochure, in a website, in a letter, or in any other way.

15. "DATE" of use of a trademark means the day, month and year of the use, or as much of that information as possible.

16. "VOLUME OF SALES" means the dollar amount of sales, *i.e.*, how much was billed for the sales and how much was paid for the sales; also the number of goods sold, *e.g.*, the number of each of the goods listed on the trademark registration inquired about.

17. "And" and "or" shall be construed conjunctively or disjunctively, whichever makes the requests more inclusive. The term "all" shall mean "any and all," and the term "any" shall mean "any and all." The singular of any word or phrase shall include

the plural of such word or phrase, and the plural of any word or phrase shall include the singular of such word or phrase.

18. The terms "DOCUMENTS," "WRITINGS" or "RECORDINGS" as used herein are used in their broadest sense and include, without limitation, any type of written, recorded, electronic, graphic or photographic matter of any kind or character, however produced or reproduced, including but not limited to all photographs, sketches, drawings, videotapes, audiotapes, letters, telegrams, telexes, facsimiles, electronic mail, correspondence, brochures, manuals, press releases, transcripts of interviews, transcripts of speeches, product guides, contracts, consulting agreements, other agreements, business plans, deeds, drafts, workpapers, plans, blueprints, specifications, comparisons, surveys, data sheets, analyses, calculations, files (and their contents), notes to the files, reports, publications, mechanical and electronic sound recordings or transcripts thereof, calendar or diary entries, memoranda of telephone or personal conversations or of meetings or conferences, maps, studies, reports, charts, inter-office communications, minutes of meetings, articles, announcements, ledgers, vouchers, checks, receipts and invoices.

19. The term "COMMUNICATION" shall mean any oral or written transmittal, correspondence, and/or receipt of words or information, whether such was by chance, pre-arranged, formal or informal, including but not limited to conversations in person, telephone conversations, telegrams, telexes, facsimiles, letters, emails, reports or memoranda, formal statements, newspaper stories, notes of telephone conversations, notes of meetings, data compilations, and electronically stored data.

20. The terms "PERSON" or "PEOPLE" include any natural person, firm, association, organization, partnership, business, trust, corporation, or public entity.

21. The term "IDENTIFY," when employed with reference to a PERSON or to PEOPLE, means to provide at least the name, address, telephone number, facsimile number, website for that PERSON or PEOPLE, as far as available.

22. The terms "RELATE" or "REFER" mean directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon any one or more subject matters described in the discovery request.

INSTRUCTIONS

1. In response to the following DOCUMENT requests, REGISTRANT is requested to furnish any DOCUMENTS referred to below that are within the possession, custody or control of REGISTRANT, including without limitation, DOCUMENTS within the possession, custody or control of REGISTRANT's present or former attorneys, accountants, representatives, consultants, agents, employees, investigators, experts, or anyone else acting on REGISTRANT's behalf.

2. To the extent REGISTRANT withholds any information, DOCUMENTS, or portion thereof, because of a claim of privilege or immunity or otherwise, please provide a privilege log setting forth the general nature of the information, DOCUMENT or thing or portion thereof withheld, as well as any other information necessary for the Board's analysis of and ruling on REGISTRANT's privilege claim, including, without limitation, identifying the DOCUMENT(s) by date, names of author and recipient, subject matter, and the number of each of these Requests with respect to which such information is being withheld.

3. All DOCUMENTS should be produced in the same form and order in which they existed prior to production, including without limitation, in the manual, booklet, binder, file, folder, envelope, or other DOCUMENT or container in which they are ordinarily kept or maintained. If for any reason the container cannot be produced, REGISTRANT should produce copies of all labels or other identifying marking(s) thereon.

4. Electronic records and computerized information must be produced in an intelligible format or together with a description of the system form which they were derived sufficient to permit rendering the records and information intelligible.

5. Any comment, notation, or marking appearing on any DOCUMENT, and not a part of the original, is to be considered a separate DOCUMENT, and any draft, preliminary form, or superseded version of any DOCUMENT is also to be considered a separate DOCUMENT.

6. To the extent that REGISTRANT objects to any portion of any category of DOCUMENTS called for by any DOCUMENT request, REGISTRANT should produce all DOCUMENTS within each category to which REGISTRANT's objections do not apply.

7. Where a request asks for DOCUMENTS related to a specified subject, the lack of that subject shall also be encompassed within the request; for example, where a request asks for DOCUMENTS related to use of a trademark, the request shall be construed as also seeking DOCUMENTS related to non-use of that trademark.

8. The capitalization of words is used only as an aid and is not required for application of the definitions set out above.

REQUESTS FOR DOCUMENTS**REQUEST FOR PRODUCTION NO. 1:**

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 2:

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 3:

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 549 MARK for retail clothing boutiques.

REQUEST FOR PRODUCTION NO. 4:

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 5:

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 6:

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods through retail clothing boutiques under the 549 MARK.

REQUEST FOR PRODUCTION NO. 7:

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 8:

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps,

hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 9:

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before November 30, 2005, of the 549 MARK for retail clothing boutiques.

REQUEST FOR PRODUCTION NO. 10:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for handbags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 11:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tote bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 12:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for traveling bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 13:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoulder bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 14:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for clutch purses before March 5, 2005.

REQUEST FOR PRODUCTION NO. 15:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for all-purpose athletic bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 16:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for backpacks before March 5, 2005.

REQUEST FOR PRODUCTION NO. 17:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for wallets before March 5, 2005.

REQUEST FOR PRODUCTION NO. 18:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for coin purses before March 5, 2005.

REQUEST FOR PRODUCTION NO. 19:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cosmetic bags sold empty before March 5, 2005.

REQUEST FOR PRODUCTION NO. 20:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bras before March 5, 2005.

REQUEST FOR PRODUCTION NO. 21:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for panties before March 5, 2005.

REQUEST FOR PRODUCTION NO. 22:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for slips before March 5, 2005.

REQUEST FOR PRODUCTION NO. 23:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for camisoles before March 5, 2005.

REQUEST FOR PRODUCTION NO. 24:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies before March 5, 2005.

REQUEST FOR PRODUCTION NO. 25:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for nightgowns before March 5, 2005.

REQUEST FOR PRODUCTION NO. 26:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pajamas before March 5, 2005.

REQUEST FOR PRODUCTION NO. 27:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sleep shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 28:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for robes before March 5, 2005.

REQUEST FOR PRODUCTION NO. 29:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 30:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for t-shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 31:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for skirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for swimwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 33:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bodysuits before March 5, 2005.

REQUEST FOR PRODUCTION NO. 34:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tap pants before March 5, 2005.

REQUEST FOR PRODUCTION NO. 35:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pants before March 5, 2005.

REQUEST FOR PRODUCTION NO. 36:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sarongs before March 5, 2005.

REQUEST FOR PRODUCTION NO. 37:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for garter belts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 38:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for stockings before March 5, 2005.

REQUEST FOR PRODUCTION NO. 39:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hosiery before March 5, 2005.

REQUEST FOR PRODUCTION NO. 40:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pantyhose before March 5, 2005.

REQUEST FOR PRODUCTION NO. 41:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for socks before March 5, 2005.

REQUEST FOR PRODUCTION NO. 42:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for footwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 43:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoes before March 5, 2005.

REQUEST FOR PRODUCTION NO. 44:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for caps before March 5, 2005.

REQUEST FOR PRODUCTION NO. 45:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hats before March 5, 2005.

REQUEST FOR PRODUCTION NO. 46:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bandannas before March 5, 2005.

REQUEST FOR PRODUCTION NO. 47:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for scarves before March 5, 2005.

REQUEST FOR PRODUCTION NO. 48:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for coats before March 5, 2005.

REQUEST FOR PRODUCTION NO. 49:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for jackets before March 5, 2005.

REQUEST FOR PRODUCTION NO. 50:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for rainwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 51:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for gloves before March 5, 2005.

REQUEST FOR PRODUCTION NO. 52:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for denim jeans before March 5, 2005.

REQUEST FOR PRODUCTION NO. 53:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tights before March 5, 2005.

REQUEST FOR PRODUCTION NO. 54:

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies with garter belts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 55:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for handbags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 56:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tote bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 57:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for traveling bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 58:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoulder bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 59:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for clutch purses before March 5, 2005.

REQUEST FOR PRODUCTION NO. 60:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for all-purpose athletic bags before March 5, 2005.

REQUEST FOR PRODUCTION NO. 61:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for backpacks before March 5, 2005.

REQUEST FOR PRODUCTION NO. 62:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for wallets before March 5, 2005.

REQUEST FOR PRODUCTION NO. 63:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coin purses before March 5, 2005.

REQUEST FOR PRODUCTION NO. 64:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for cosmetic bags sold empty before March 5, 2005.

REQUEST FOR PRODUCTION NO. 65:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bras before March 5, 2005.

REQUEST FOR PRODUCTION NO. 66:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for panties before March 5, 2005.

REQUEST FOR PRODUCTION NO. 67:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for slips before March 5, 2005.

REQUEST FOR PRODUCTION NO. 68:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for camisoles before March 5, 2005.

REQUEST FOR PRODUCTION NO. 69:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies before March 5, 2005.

REQUEST FOR PRODUCTION NO. 70:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for nightgowns before March 5, 2005.

REQUEST FOR PRODUCTION NO. 71:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pajamas before March 5, 2005.

REQUEST FOR PRODUCTION NO. 72:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sleep shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 73:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for robes before March 5, 2005.

REQUEST FOR PRODUCTION NO. 74:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 75:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for t-shirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 76:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for skirts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 77:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for swimwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 78:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bodysuits before March 5, 2005.

REQUEST FOR PRODUCTION NO. 79:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tap pants before March 5, 2005.

REQUEST FOR PRODUCTION NO. 80:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pants before March 5, 2005.

REQUEST FOR PRODUCTION NO. 81:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sarongs before March 5, 2005.

REQUEST FOR PRODUCTION NO. 82:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for garter belts before March 5, 2005.

REQUEST FOR PRODUCTION NO. 83:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for stockings before March 5, 2005.

REQUEST FOR PRODUCTION NO. 84:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hosiery before March 5, 2005.

REQUEST FOR PRODUCTION NO. 85:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pantyhose before March 5, 2005.

REQUEST FOR PRODUCTION NO. 86:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for socks before March 5, 2005.

REQUEST FOR PRODUCTION NO. 87:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for footwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 88:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoes before March 5, 2005.

REQUEST FOR PRODUCTION NO. 89:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for caps before March 5, 2005.

REQUEST FOR PRODUCTION NO. 90:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hats before March 5, 2005.

REQUEST FOR PRODUCTION NO. 91:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bandannas before March 5, 2005.

REQUEST FOR PRODUCTION NO. 92:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for scarves before March 5, 2005.

REQUEST FOR PRODUCTION NO. 93:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coats before March 5, 2005.

REQUEST FOR PRODUCTION NO. 94:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for jackets before March 5, 2005.

REQUEST FOR PRODUCTION NO. 95:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for rainwear before March 5, 2005.

REQUEST FOR PRODUCTION NO. 96:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for gloves before March 5, 2005.

REQUEST FOR PRODUCTION NO. 97:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for denim jeans before March 5, 2005.

REQUEST FOR PRODUCTION NO. 98:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tights before March 5, 2005.

REQUEST FOR PRODUCTION NO. 99:

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies with garters before March 5, 2005.

REQUEST FOR PRODUCTION NO. 100:

DOCUMENTS sufficient to show YOUR USE of the 549 MARK for retail clothing boutiques before November 30, 2005.

REQUEST FOR PRODUCTION NO. 101:

DOCUMENTS YOU referred to, used or relied on to answer any of PETITIONER's interrogatories to YOU.

REQUEST FOR PRODUCTION NO. 102:

Documents that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 103:

Documents that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits,

tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 104:

Documents that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 105:

Documents that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 106:

Documents that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 107:

Documents that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 108:

Documents that REFER to or RELATE to advertising in COMMERCE of any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION,

namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

REQUEST FOR PRODUCTION NO. 109:

Documents that REFER to or RELATE to advertising in COMMERCE of any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

REQUEST FOR PRODUCTION NO. 110:

Documents that REFER to or RELATE to advertising in COMMERCE of the 549 MARK.

REQUEST FOR PRODUCTION NO. 111:

All documents that REFER or RELATE to the PETITION.

REQUEST FOR PRODUCTION NO. 112:

All documents that REFER or RELATE to the ANSWER.

REQUEST FOR PRODUCTION NO. 113:

All documents that REFER or RELATE to any relief sought in the ANSWER.

REQUEST FOR PRODUCTION NO. 114:

All documents that REFER or RELATE to the allegations in paragraph numbered 13 in the ANSWER.

REQUEST FOR PRODUCTION NO. 115:

All documents that REFER or RELATE to the allegations in paragraph numbered 14 in the ANSWER.

REQUEST FOR PRODUCTION NO. 116:

All documents that REFER or RELATE to the allegations in paragraph numbered 15 in the ANSWER.

REQUEST FOR PRODUCTION NO. 117:

All documents that REFER or RELATE to the allegations in paragraph numbered 16 in the ANSWER.

REQUEST FOR PRODUCTION NO. 118:

All documents that REFER or RELATE to the allegations in paragraph numbered 17 in the ANSWER.

REQUEST FOR PRODUCTION NO. 119:

All documents that REFER or RELATE to the allegations in paragraph numbered 18 in the ANSWER.

REQUEST FOR PRODUCTION NO. 120:

All documents that REFER or RELATE to the allegations in paragraph numbered 19 in the ANSWER.

REQUEST FOR PRODUCTION NO. 121:

All documents that REFER or RELATE to the allegations in paragraph numbered 22 in the ANSWER.

REQUEST FOR PRODUCTION NO. 122:

All documents that REFER or RELATE to the allegations in paragraph numbered 23 in the ANSWER.

REQUEST FOR PRODUCTION NO. 123:

All documents that REFER or RELATE to the allegations in paragraph numbered 24 in the ANSWER.

REQUEST FOR PRODUCTION NO. 124:

All documents that REFER or RELATE to the allegations in paragraph numbered 25 in the ANSWER.

REQUEST FOR PRODUCTION NO. 125:

All documents that REFER or RELATE to the allegations in paragraph numbered 27 in the ANSWER.

REQUEST FOR PRODUCTION NO. 126:

All documents that REFER or RELATE to the allegations in paragraph numbered 29 in the ANSWER.

REQUEST FOR PRODUCTION NO. 127:

All documents that REFER or RELATE to the allegations in paragraph numbered 31 in the ANSWER.

REQUEST FOR PRODUCTION NO. 128:

All documents that REFER or RELATE to the allegations in paragraph numbered 33 in the ANSWER.

REQUEST FOR PRODUCTION NO. 129:

All documents that REFER or RELATE to the allegations in paragraph numbered 34 in the ANSWER.

REQUEST FOR PRODUCTION NO. 130:

All documents that REFER or RELATE to the allegations in paragraph numbered 35 in the ANSWER.

REQUEST FOR PRODUCTION NO. 131:

All documents that REFER or RELATE to the affirmative defenses in the ANSWER.

REQUEST FOR PRODUCTION NO. 132:

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 997 MARK.

REQUEST FOR PRODUCTION NO. 133:

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 241 MARK.

REQUEST FOR PRODUCTION NO. 134:

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 549 MARK.

REQUEST FOR PRODUCTION NO. 135:

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 997 MARK, including any negotiations or communications RELATING thereto.

REQUEST FOR PRODUCTION NO. 136:

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 241 MARK, including any negotiations or communications RELATING thereto.

REQUEST FOR PRODUCTION NO. 137:

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 549 MARK, including any negotiations or communications RELATING thereto.

REQUEST FOR PRODUCTION NO. 138:

All documents that REFER or RELATE to REGISTRANT's decision to oppose the PETITION, including memoranda, investigations, reports, opinions, and statements by third parties relied upon by REGISTRANT.

REQUEST FOR PRODUCTION NO. 139:

An electronic copy of each version and page of any website of REGISTRANT.

REQUEST FOR PRODUCTION NO. 140:

All documents that comprise, REFER to, RELATE to, or reflect upon any license agreement to which REGISTRANT is a party concerning any trademark.

REQUEST FOR PRODUCTION NO. 141:

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 997 MARK.

REQUEST FOR PRODUCTION NO. 142:

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 241 MARK.

REQUEST FOR PRODUCTION NO. 143:

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort,

or agreement to manufacture, market, sell or offer for sale any goods under the 549 MARK.

REQUEST FOR PRODUCTION NO. 144:

All documents that REFER to, RELATE to, or reflect upon each and every trademark license granted by REGISTRANT.

REQUEST FOR PRODUCTION NO. 145:

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 997 MARK.

REQUEST FOR PRODUCTION NO. 146:

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 241 MARK.

REQUEST FOR PRODUCTION NO. 147:

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 549 MARK.

REQUEST FOR PRODUCTION NO. 148:

All documents REGISTRANT intends to use or may use at trial.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

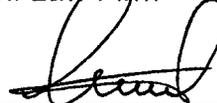
Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO REGISTRANT SAROJ INTERNATIONAL has been served on Gary L. Eastman, Esq., Attorney for Registrant Saroj International, Inc., by mailing said copy on August 2, 2007, via First Class Mail, postage prepaid, to: Gary L. Eastman, APLC, 707 Broadway Street, Suite 1800, San Diego, California 92101.

Date: August 2, 2007

Stahl Law Firm



Norbert Stahl, Esq.
Registration No. 44,350

Attorney for Petitioner
LIVE VENTURES INC.

Correspondence Address:

Stahl Law Firm
2 Meadowsweet Lane
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT C

TRADEMARK

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

LIVE VENTURES, INC.
Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.
Registrant.

Registration No: 3143997
Registration No: 3147241
Registration No: 3158549

CANCELLATION NO: 92047661

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
RESPONSE TO PETITIONER'S FIRST SET OF INTERROGATORIES**

Registrant Saroj International's Response to
Petitioner's First Set of Interrogatories

I. General Objections

The following general objections are continuing in nature and shall apply to each Request and shall be incorporated into each response. Each individual Response is made subject to, and without waiver of, such general objection.

1. Saroj International, Inc.'s Responses herein are based upon the facts it knows at this time. Saroj International, Inc. may become aware of additional data, documentation and/or other and more specific facts which may be material to its Responses herein. Accordingly, Saroj International, Inc. reserves its rights to supplement or modify these Responses, in its sole discretion.

2. Saroj International, Inc. objects generally to the First Set as overly broad, unduly and oppressive insofar as Petitioner seeks to discover information about matters not relevant to the subject matter of this action, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of its objections, Saroj International, Inc. will respond to the extent the First Set is relevant to the subject matter of this action, or is reasonably calculated to lead to the discovery of admissible evidence.

3. Saroj International, Inc. objects generally to the First Set insofar as it may be construed as calling for the disclosure of material or information

which is privileged and/or reflect attorney work product. To the extent Responses would include privileged or protected information, Saroj International, Inc. will not respond.

4. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome, oppressive, vague, ambiguous and uncertain insofar as the instructions and definitions used in the First Set purport to impose obligations on Saroj International, Inc. beyond the scope of Rule 33. Without waiver of its objections, Saroj International, Inc. will respond consistent with the requirements of Rule 33.

5. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is not clearly identified or is not identified with sufficient particularity. Without waiver of its objections, Saroj International, Inc. has made reasonable interpretations of Petitioner's intended meanings, and will respond accordingly to such interpretations as set forth below.

6. Saroj International, Inc. objects generally to the First Set to the extent that does not specify a time period for any of the information sought.

7. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is keenly proprietary and represents trade secret information under State and Federal Law including the Uniform Trades Secrets Act, the disclosure of

which will not be made unless a suitable Protective Order is in place.

II. Responses to Interrogatories

Interrogatory No. 1

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for backpacks prior to March 5, 2005.

Response to Interrogatory No. 1

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 2

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for wallets prior to March 5, 2005.

Response to Interrogatory No. 2

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to

ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 3

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for t-shirts prior to March 5, 2005.

Response to Interrogatory No. 3

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 4

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for swimwear prior to March 5, 2005.

Response to Interrogatory No. 4

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and

circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 5

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for socks prior to March 5, 2005.

Response to Interrogatory No. 5

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 6

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for shoes prior to March 5, 2005.

Response to Interrogatory No. 6

Saroj International, Inc. has made a diligent search and reasonable

inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 7

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for hats prior to March 5, 2005.

Response to Interrogatory No. 7

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 8

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for scarves prior to March 5, 2005.

Response to Interrogatory No. 8

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 9

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for coats prior to March 5, 2005.

Response to Interrogatory No. 9

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 10

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for jackets prior to March 5, 2005.

Response to Interrogatory No. 10

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 11

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for rainwear prior to March 5, 2005.

Response to Interrogatory No. 11

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 12

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR

USE of the 997 MARK for gloves prior to March 5, 2005.

Response to Interrogatory No. 12

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 13

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for denim jeans prior to March 5, 2005.

Response to Interrogatory No. 13

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 14

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for backpacks prior to March 5, 2005.

Response to Interrogatory No. 14

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 15

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for wallets prior to March 5, 2005.

Response to Interrogatory No. 15

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 16

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for t-shirts prior to March 5, 2005.

Response to Interrogatory No. 16

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 17

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for swimwear prior to March 5, 2005.

Response to Interrogatory No. 17

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when

appropriate.

Interrogatory No. 18

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for socks prior to March 5, 2005.

Response to Interrogatory No. 18

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 19

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for shoes prior to March 5, 2005.

Response to Interrogatory No. 19

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under

FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 20

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for hats prior to March 5, 2005.

Response to Interrogatory No. 20

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 21

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for scarves prior to March 5, 2005.

Response to Interrogatory No. 21

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 22

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for coats prior to March 5, 2005.

Response to Interrogatory No. 22

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 23

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for jackets prior to March 5, 2005.

Response to Interrogatory No. 23

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to

ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 24

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for rainwear prior to March 5, 2005.

Response to Interrogatory No. 24

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 25

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for gloves prior to March 5, 2005.

Response to Interrogatory No. 25

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and

circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 26

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for denim jeans prior to March 5, 2005.

Response to Interrogatory No. 26

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 27

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 549 MARK for retail clothing boutiques prior to November 30, 2005.

Response to Interrogatory No. 27

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 28

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK.

Response to Interrogatory No. 28

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 29

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK.

Response to Interrogatory No. 29

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 30

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 549 MARK.

Response to Interrogatory No. 30

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 31

Provide quarterly sales figures in COMMERCE beginning January 1,

2001, for goods under the 997 MARK.

Response to Interrogatory No. 31

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 32

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 241 MARK.

Response to Interrogatory No. 32

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 33

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 549 MARK.

Response to Interrogatory No. 33

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 34

IDENTIFY all PERSONS that have ever USED the 997 MARK.

Response to Interrogatory No. 34

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 35

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 34, describe the USE of the 997 MARK by such PERSON.

Response to Interrogatory No. 35

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 36

IDENTIFY all PERSONS that have ever USED the 241 MARK.

Response to Interrogatory No. 36

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 37

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 36, describe the USE of the 241 MARK by such PERSON.

Response to Interrogatory No. 37

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 38

IDENTIFY all PERSONS that have ever USED the 549 MARK.

Response to Interrogatory No. 38

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when

appropriate.

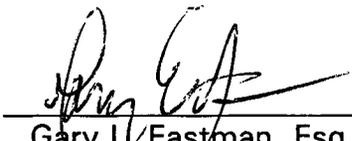
Interrogatory No. 39

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 38, describe the USE of the 549 MARK by such PERSON.

Response to Interrogatory No. 39

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Dated: September 6, 2007

By: 

Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

GARY L. EASTMAN, APLC
707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone: (619) 230-1144
Facsimile: (619) 230-1194

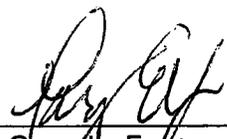
CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Response to First Set of Requests for Production has been served on PETITIONER LIVE VENTURES, INC. by

mailing said copy on September 6 2007 via First Class Mail, postage prepaid to:

NORBERT STAHL, ESQ
STAHL LAW FIRM
2 MEADOWS LANE
SAN CARLOS, CALIFORNIA 94070.

Dated: September 6, 2007

By: 

Gary U. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT D

TRADEMARK

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

LIVE VENTURES, INC.
Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.
Registrant.

CANCELLATION NO: 92047661

Registration No: 3143997
Registration No: 3147241
Registration No: 3158549

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
RESPONSE TO PETITIONER'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS**

Registrant Saroj International's Response to
Petitioner's First Set of Requests for Production

I. General Objections

The following general objections are continuing in nature and shall apply to each Request and shall be incorporated into each response. Each individual Response is made subject to, and without waiver of, such general objection.

1. Saroj International, Inc.'s Responses herein are based upon the facts it knows at this time. Saroj International, Inc. may become aware of additional data, documentation and/or other and more specific facts which may be material to its Responses herein. Accordingly, Saroj International, Inc. reserves its rights to supplement or modify these Responses, in its sole discretion.

2. Saroj International, Inc. objects generally to the First Set as overly broad, unduly and oppressive insofar as Petitioner seeks to discover information about matters not relevant to the subject matter of this action, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of its objections, Saroj International, Inc. will respond to the extent the First Set is relevant to the subject matter of this action, or is reasonably calculated to lead to the discovery of admissible evidence.

3. Saroj International, Inc. objects generally to the First Set insofar as it may be construed as calling for the disclosure of material or information

which is privileged and/or reflect attorney work product. To the extent Responses would include privileged or protected information, Saroj International, Inc. will not respond.

4. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome, oppressive, vague, ambiguous and uncertain insofar as the instructions and definitions used in the First Set purport to impose obligations on Saroj International, Inc. beyond the scope of Rule 33. Without waiver of its objections, Saroj International, Inc. will respond consistent with the requirements of Rule 33.

5. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is not clearly identified or is not identified with sufficient particularity. Without waiver of its objections, Saroj International, Inc. has made reasonable interpretations of Petitioner's intended meanings, and will respond accordingly to such interpretations as set forth below.

6. Saroj International, Inc. objects generally to the First Set to the extent that does not specify a time period for any of the information sought.

7. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is keenly proprietary and represents trade secret information under State and Federal Law including the Uniform Trades Secrets Act, the disclosure of

which will not be made unless a suitable Protective Order is in place.

II. Responses to Requests for Production

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental

Responses when appropriate.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 549 MARK for retail clothing boutiques.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Saroj International, Inc. objects to this Request as being overly broad,

ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. objects to this Request as it seeks to discover confidential and proprietary information. Such proprietary information will only be provided under a suitable protective order.

REQUEST FOR PRODUCTION NO. 5

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. objects to this Request as it seeks to discover confidential and proprietary information. Such proprietary information will only be provided under a suitable protective order.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods through retail clothing boutiques under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. objects to this Request as it seeks to discover confidential and proprietary information. Such proprietary information will only be provided under a suitable protective order.

REQUEST FOR PRODUCTION NO. 7

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 8

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slippers, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc.

will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 9

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before November 30, 2005, of the 549 MARK for retail clothing boutiques.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for handbags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tote bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 12

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for traveling bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 13

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 14

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 15

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 16

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 17

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 18

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 19

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 20

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bras before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 21

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 22

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 23

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 24

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 25

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 28

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 29

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for t-shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 31

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for skirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 34

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tap pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 36

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 38

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for stockings before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 39

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 40

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 41

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for socks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for footwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 43

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 44

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for caps before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 45

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 47

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 48

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cots before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 49

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 50

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 51

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for gloves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 52

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for denim jeans before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 53

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tights before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 54

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies with garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 55

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for handbags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 56

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tote bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(

REQUEST FOR PRODUCTION NO. 57

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for traveling bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 58

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 59

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 60

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 61

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 62

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 63

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 65

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bras before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 66

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 67

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 68

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 69

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 70

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 71

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 72

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 73

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 74

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 75

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for t-shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 76

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for skirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 77

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 78

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 79

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tap pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 80

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP

26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 81

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 82

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 83

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for

stockings before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 84

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 85

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Saroj International, Inc. has made a diligent search and reasonable

inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 86

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for socks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 87

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for footwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP

26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 88

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 89

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for caps before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 90

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hats

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 91

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 92

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

Saroj International, Inc. has made a diligent search and reasonable

inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 93

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 94

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP

26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 95

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 96

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for gloves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 97

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for

denim jeans before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 98

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tights before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 99

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies with garters before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

Saroj International, Inc. has made a diligent search and reasonable

inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 100

DOCUMENTS sufficient to show YOUR USE of the 549 MARK for retail clothing boutiques before November 30, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 101

DOCUMENTS YOU referred to, used or relied on to answer any of PETITIONER'S interrogatories to YOU.

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP

26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 102

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 102:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request.

Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 103

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 103:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request.

Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 104

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 104:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request.

Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 105

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU

have ever sold in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 105:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request.

Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 106

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 997 MARK for each

and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 106:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. objects to this Request as it seeks to discover confidential and proprietary information. Such proprietary information will only be provided under a suitable protective order.

REQUEST FOR PRODUCTION NO. 107

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes,

shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 107:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. objects to this Request as it seeks to discover confidential and proprietary information. Such proprietary information will only be provided under a suitable protective order.

REQUEST FOR PRODUCTION NO. 108

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 108:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 109:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP

26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 110

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 110:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 111

All documents that REFER or RELATE to the PETITION.

RESPONSE TO REQUEST FOR PRODUCTION NO. 111:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 112

All documents that REFER or RELATE to the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 112:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 113

All documents that REFER or RELATE to any relief sought in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 113:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 114

All documents that REFER or RELATE to the allegations in paragraph numbered 13 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 114:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc.

will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 115

All documents that REFER or RELATE to the allegations in paragraph numbered 14 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 115:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 116

All documents that REFER or RELATE to the allegations in paragraph numbered 15 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 116:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 117

All documents that REFER or RELATE to the allegations in paragraph numbered 16 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 117:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 118

All documents that REFER or RELATE to the allegations in paragraph numbered 17 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 118:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 119

All documents that REFER or RELATE to the allegations in paragraph numbered 18 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 119:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 120

All documents that REFER or RELATE to the allegations in paragraph numbered 19 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 120:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 121

All documents that REFER or RELATE to the allegations in paragraph numbered 22 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 121:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc.

will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 122

All documents that REFER or RELATE to the allegations in paragraph numbered 23 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 122:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 123

All documents that REFER or RELATE to the allegations in paragraph numbered 24 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 123:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 124

All documents that REFER or RELATE to the allegations in paragraph numbered 25 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 124:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 125

All documents that REFER or RELATE to the allegations in paragraph numbered 27 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 125:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 126

All documents that REFER or RELATE to the allegations in paragraph numbered 29 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 126:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 127

All documents that REFER or RELATE to the allegations in paragraph numbered 31 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 127:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 128

All documents that REFER or RELATE to the allegations in paragraph numbered 33 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 128:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 129

All documents that REFER or RELATE to the allegations in paragraph numbered 34 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 129:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 130

All documents that REFER or RELATE to the allegations in paragraph numbered 35 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 130:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 131

All documents that REFER or RELATE to the affirmative defenses in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 131:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 132

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 132:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Saroj International, Inc. objects to this Request as it seeks to discover

documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 133

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 133:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate. Saroj International, Inc. objects to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 134

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 134:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate. Saroj International, Inc. objects to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 135

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 997 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 135:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 136

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 241 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 136:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 137

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 549 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 137:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been

unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 138

All documents that REFER or RELATE to REGISTRANT's decision to oppose the PETITION, including memoranda, investigations, reports, opinions, and statements by third parties relied upon by REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 138:

Saroj International, Inc. objects to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 139

An electronic copy of each version and page of any website of REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 139:

Saroj International, Inc. will produce a document or documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 140

All documents that comprise, REFER to, RELATE to, or reflect upon any license agreement to which REGISTRANT is a party concerning any trademark.

RESPONSE TO REQUEST FOR PRODUCTION NO. 140:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 141

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 141:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 142

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale

any goods under the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 142:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 143

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 143:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 144

All documents that REFER to, RELATE to, or reflect upon each and every trademark license granted by REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 144:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 145

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 145:

Saroj International, Inc. objects to this Request as it seeks to discover confidential and proprietary information. Such proprietary information will only be provided under a suitable protective order.

REQUEST FOR PRODUCTION NO. 146

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 146:

Saroj International, Inc. objects to this Request as it seeks to discover confidential and proprietary information. Such proprietary information will only be provided under a suitable protective order.

REQUEST FOR PRODUCTION NO. 147

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 147:

Saroj International, Inc. objects to this Request as it seeks to discover confidential and proprietary information. Such proprietary information will only be provided under a suitable protective order.

REQUEST FOR PRODUCTION NO. 148

All documents REGISTRANT intends to use or may use at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 148:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request.

Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Dated: September 6, 2007

By: 

Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

GARY L. EASTMAN, APLC
707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone: (619) 230-1144
Facsimile: (619) 230-1194

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Response to First Set of Requests for Production has been served on PETITIONER LIVE VENTURES, INC. by

mailing said copy on September 6 2007 via First Class Mail, postage prepaid to:

NORBERT STAHL, ESQ
STAHL LAW FIRM
2 MEADOWS LANE
SAN CARLOS, CALIFORNIA 94070.

Dated: September 6, 2007

By: 

Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT E

GARY L. EASTMAN, APLC

Focusing on Start-Up and
Emerging Company Counseling
Patent, Trademark, Copyright
and Related Litigation

707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone (619) 230-1144
Facsimile (619) 230-1194

GARY L. EASTMAN, Esq.
Registered Patent Attorney

garyeastman@sbcglobal.net

Via Facsimile (650) 802-8484 & U.S. Mail

September 7, 2007

NORBERT STAHL, ESQ,
STAHL LAW FIRM
2 MEADOWS LANE
SAN CARLOS, CALIFORNIA 94070

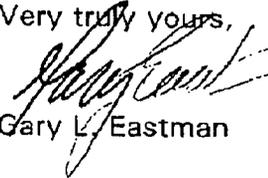
RE: United States Federal Trademark Registrations
of Saroj International, Inc. (3143997, 3147241, and 3158549
Petition for Cancellation by Live Ventures, Inc. No. 92047661

Dear Mr. Stahl:

We are in receipt of your Discovery (First Set) propounded August 2, 2007, which included Requests for Admissions, Requests for Production of Documents, and Interrogatories. We are conducting our investigations, and have prepared and timely served Responses to the First Set. However, please note that Mr. Jaivin Karnani, the principal of Saroj International, Inc. was out of the country for most of the month of August. As a result, our investigation is ongoing and each of the Responses will likely be supplemented.

Please feel free to contact me to discuss this matter further.

Very truly yours,


Gary L. Eastman

GLE:

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT F

STAHL LAW FIRM

Intellectual Property Representation

September 10, 2007

Gary L. Eastman, APLC
707 Broadway Street, Ste 1800
San Diego, CA 92101

PER FACSIMILE
To: (619) 230-1194
Total Page(s): 14

Re: LIVE VENTURES INC. v. SAROJ INTERNATIONAL, INC.
Trademark Cancellation Proceeding No. 92047661

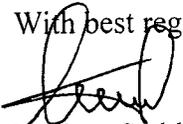
Dear Mr. Eastman:

I am writing with respect to Saroj International, Inc.'s responses to Live Ventures Inc.'s Requests for Production of Documents and Things, Requests for Admissions and Interrogatories. We enclose an executed copy of the standard stipulated protective order of the Trademark Trial and Appeal Board for this proceeding. Please date and sign for Saroj International.

Please produce all documents and things (and any other discovery) currently withheld on the basis that no protective order is in place (for example, documents and things responsive to document requests number 4-6, 106, 107, 145-147). Please note that the attached protective order is binding on execution by the parties, as provided in the TBMP and as recited in the order.

Please also note that the street address for our offices is 2 Meadowsweet Lane, not 2 Meadows Lane. Thank you.

With best regards,


Norbert Stahl

Enclosure

*** TX REPORT ***

TRANSMISSION OK

TX/RX NO 0111
DESTINATION TEL # 16192301194
DESTINATION ID
ST. TIME 09/10 08:34
TIME USE 01:55
PAGES SENT 14
RESULT OK

STAHL LAW FIRM

Intellectual Property Representation

September 10, 2007

Gary L. Eastman, APLC
707 Broadway Street, Ste 1800
San Diego, CA 92101

PER FACSIMILE
To: (619) 230-1194
Total Page(s): 14

Re: LIVE VENTURES INC. V. SAROJ INTERNATIONAL, INC.
Trademark Cancellation Proceeding No. 92047661

Dear Mr. Eastman:

I am writing with respect to Saroj International, Inc.'s responses to Live Ventures Inc.'s Requests for Production of Documents and Things, Requests for Admissions and Interrogatories. We enclose an executed copy of the standard stipulated protective order of the Trademark Trial and Appeal Board for this proceeding. Please date and sign for Saroj International.

Please produce all documents and things (and any other discovery) currently withheld on the basis that no protective order is in place (for example, documents and things responsive to document requests number 4-6, 106, 107, 145-147). Please note that the attached protective order is binding on execution by the parties, as provided in the TBMP and as recited in the order.

Please also note that the street address for our offices is 2 Meadowsweet Lane, not 2

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT G



Print - Close Window

Date: Mon, 17 Sep 2007 15:01:50 -0700 (PDT)
From: nstahl@patentlawservice.com
Subject: Live Ventures v Saroj
To: "Gary Eastman" <garyeastman@sbcglobal.net>

Dear Mr. Eastman:

As discussed earlier today, you will email pdf versions of Saroj's fully supplemented responses to Live Ventures Interrogatories, Requests for Admissions and Document Requests to me by 5 pm today. You will send today all documents and things that are responsive to Live Ventures document requests for delivery tomorrow by FedEx. Please provide the FedEx tracking number by email today.

I reiterate that you have promised me fully updated responses first by last Friday, then by today, and now by tomorrow. The pattern is unmistakable and I confirm that if we do not receive the full responses as promised by you personally today, following two false representations on this subject last week, we will move for an order compelling such responses.

With best regards,

Norbert Stahl

Norbert Stahl, Esq.
Stahl Law Firm
2 Meadowsweet Ln
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)
www.patentlawservice.com

NOTICE: This communication may contain information that is privileged or protected by law. If you have received this communication in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents and please destroy any hard copies made. No privilege or protection is waived. Thank you.

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT H



Print - Close Window

From: "Gary Eastman" <garyeastman@sbcglobal.net>
To: nstahl@patentlawservice.com
CC: ""Gary Eastman"" <garyeastman@sbcglobal.net>
Subject: RE: Live Ventures v Saroj
Date: Mon, 17 Sep 2007 17:40:56 -0700

Mr. Stahl:

Per our earlier discussion, the documents to be produced at this time are contained in the following:

FEDEX Tracking No.: 7924-2057-0025 to be delivered to your office address tomorrow, September 18, 2007.

I am awaiting execution of the supplemental responses from Mr. Karnani, and will forward immediately upon receipt.

Thank you for your courtesy.

Regards,

Gary L. Eastman, Esq., APLC
707 Broadway Street, Suite 1800
San Diego, CA 92101
(619) 230-1144
Fax (619) 230-1194
garyeastman@sbcglobal.net

This communication has been sent by a law office, and may contain confidential and/or privileged information. It is intended only for the addressee, and any further transmission of this message is not authorized. If this communication has been misdirected, please delete it immediately and email garyeastman@sbcglobal.net to report the error.

From: nstahl@patentlawservice.com [mailto:nstahl@patentlawservice.com]
Sent: Monday, September 17, 2007 3:02 PM
To: Gary Eastman
Subject: Live Ventures v Saroj

Dear Mr. Eastman:

As discussed earlier today, you will email pdf versions of Saroj's fully supplemented responses to Live Ventures Interrogatories, Requests for Admissions and Document Requests to me by 5 pm today. You will send today all documents and things that are responsive to Live Ventures document requests for delivery tomorrow by FedEx. Please provide the FedEx tracking number by email today.

I reiterate that you have promised me fully updated responses first by last Friday, then by today, and now by tomorrow. The pattern is unmistakable and I confirm that if we do not receive the full responses as promised by you personally today, following two false representations on this subject last week, we will move for an order compelling such responses.

With best regards,

Norbert Stahl

Norbert Stahl, Esq.
Stahl Law Firm
2 Meadowsweet Ln
San Carlos , CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)
www.patentlawservice.com

NOTICE: This communication may contain information that is privileged or protected by law. If you have received this communication in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents and please destroy any hard copies made. No privilege or protection is waived. Thank you.

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT I



Print - Close Window

Date: Mon, 17 Sep 2007 19:15:57 -0700 (PDT)
From: nstahl@patentlawservice.com
Subject: RE: Live Ventures v Saroj
To: "Gary Eastman" <garyeastman@sbcglobal.net>

Dear Mr. Eastman:

You again failed to deliver the outstanding discovery as you promised. You do not even let me know when we can now expect the fully supplemented responses. Your email merely indicates that we shall have them once you have. That is not sufficient. We will now move for orders compelling discovery responses.

Sincerely,
Norbert Stahl

Gary Eastman <garyeastman@sbcglobal.net> wrote:

Mr. Stahl:

Per our earlier discussion, the documents to be produced at this time are contained in the following:

FEDEX Tracking No.: 7924-2057-0025 to be delivered to your office address tomorrow, September 18, 2007.

I am awaiting execution of the supplemental responses from Mr. Karnani, and will forward immediately upon receipt.

Thank you for your courtesy.

Regards,

Gary L. Eastman, Esq., APLC
707 Broadway Street, Suite 1800
San Diego, CA 92101
(619) 230-1144
Fax (619) 230-1194
garyeastman@sbcglobal.net

This communication has been sent by a law office, and may contain confidential and/or privileged information. It is intended only for the addressee, and any further transmission of this message is not authorized. If this communication has been misdirected, please delete it immediately and email garyeastman@sbcglobal.net to report the error.

From: nstahl@patentlawservice.com [mailto:nstahl@patentlawservice.com]
Sent: Monday, September 17, 2007 3:02 PM
To: Gary Eastman
Subject: Live Ventures v Saroj

Dear Mr. Eastman:

As discussed earlier today, you will email pdf versions of Saroj's fully supplemented responses to Live Ventures Interrogatories, Requests for Admissions and Document Requests to me by 5 pm today. You will send today all documents and things that are responsive to Live Ventures document requests for delivery tomorrow by FedEx. Please provide the FedEx tracking number by email today.

I reiterate that you have promised me fully updated responses first by last Friday, then by today, and now by tomorrow. The pattern is unmistakable and I confirm that if we do not receive the full responses as promised by you personally today, following two false representations on this subject last week, we will move for an order compelling such responses.

With best regards,

Norbert Stahl

Norbert Stahl, Esq.
Stahl Law Firm
2 Meadowsweet Ln
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)
www.patentlawservice.com

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Norbert Stahl, Esq.
Stahl Law Firm
2 Meadowsweet Ln
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)
www.patentlawservice.com

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Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT J



Print - Close Window

From: "Gary Eastman" <garyeastman@sbcglobal.net>
To: nstahl@patentlawservice.com
CC: ""Gary Eastman"" <garyeastman@sbcglobal.net>
Subject: RE: Live Ventures v Saroj
Date: Tue, 18 Sep 2007 10:04:36 -0700

Mr. Stahl:

I am a bit perplexed at the tone of your letter from yesterday evening as it is inconsistent with our telephone discussion of the same morning.

We provided timely responses to your Discovery requests. Due to the unavailability of personnel, we communicated with you directly that our Responses would be supplemented with additional information as it was discovered or became available, as is required by the Federal Rules of Civil Procedure. Since that date, we have been in periodic communication regarding our providing the supplemental Responses and information. When I spoke with you yesterday via telephone, I indicated we had collected, stamped, and were providing via FedEx documents responsive to your Requests for Production. I also indicated we were reviewing our supplemental Responses to Requests for Admission, Request for Production, and Interrogatories, and would provide you with the signed supplemental Responses immediately upon receipt.

What is perplexing is that in response to my providing you with the FedEx Tracking Number – a clear indication that we are providing you with the documents you have requested - you now feel it necessary to make motion compelling discovery responses.

This letter shall confirm that we have already sent via FedEx all documents available at this time, and will be providing you with the supplemental responses immediately upon receipt from our client, which should be no later than close of business today.

Meanwhile, should you wish to discuss this matter further, please do not hesitate to call.

Regards,

Gary L. Eastman, Esq., APLC
707 Broadway Street, Suite 1800
San Diego, CA 92101
(619) 230-1144
Fax (619) 230-1194
garyeastman@sbcglobal.net

This communication has been sent by a law office, and may contain confidential and/or privileged information. It is intended only for the addressee, and any further transmission of this message is not authorized. If this communication has been misdirected, please delete it immediately and email garyeastman@sbcglobal.net to report the error.

From: nstahl@patentlawservice.com [<mailto:nstahl@patentlawservice.com>]
Sent: Monday, September 17, 2007 7:16 PM
To: Gary Eastman
Subject: RE: Live Ventures v Saroj

Dear Mr. Eastman:

You again failed to deliver the outstanding discovery as you promised. You do not even let me know when we can now expect the fully supplemented responses. Your email merely indicates that we shall have them once you have. That is not sufficient. We will now move for orders compelling discovery responses.

Sincerely,
Norbert Stahl

Gary Eastman <garyeastman@sbcglobal.net> wrote:

Mr. Stahl:

Per our earlier discussion, the documents to be produced at this time are contained in the following:

FEDEX Tracking No.: 7924-2057-0025 to be delivered to your office address tomorrow, September 18, 2007.

I am awaiting execution of the supplemental responses from Mr. Karnani, and will forward immediately upon receipt.

Thank you for your courtesy.

Regards,

Gary L. Eastman, Esq., APLC
707 Broadway Street, Suite 1800
San Diego, CA 92101
(619) 230-1144
Fax (619) 230-1194
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From: nstahl@patentlawservice.com [<mailto:nstahl@patentlawservice.com>]
Sent: Monday, September 17, 2007 3:02 PM
To: Gary Eastman
Subject: Live Ventures v Saroj

Dear Mr. Eastman:

As discussed earlier today, you will email pdf versions of Saroj's fully supplemented responses to Live Ventures Interrogatories, Requests for Admissions and Document Requests to me by 5 pm today. You will send today all documents and things that are responsive to Live Ventures document requests for delivery tomorrow by FedEx. Please provide the FedEx tracking number by email today.

I reiterate that you have promised me fully updated responses first by last Friday, then by today, and now by tomorrow. The pattern is unmistakable and I confirm that if we do not receive the full responses as promised by you personally today, following two false representations on this subject last week, we will move for an order compelling such responses.

With best regards,

Norbert Stahl

Norbert Stahl, Esq.
Stahl Law Firm
2 Meadowsweet Ln
San Carlos , CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)
www.patentlawservice.com

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Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT K



Print - Close Window

Date: Tue, 18 Sep 2007 10:23:29 -0700 (PDT)
From: nstahl@patentlawservice.com
Subject: RE: Live Ventures v Saroj
To: "Gary Eastman" <garyeastman@sbcglobal.net>

Dear Mr. Eastman:

Your email misrepresents the facts. During our entire meet and confer process, you have misrepresented the situation and have repeatedly given me false information on when we will receive the long overdue discovery. Yesterday, you told me that we will have pdf files of all of Saroj's supplementations by 5 pm yesterday - apparently that was also false. You appear to engage in this scheme without any concern that your representations should be truthful. Had you been truthful last week, we would have filed our motion then. As things stand, we will file it this week. If we receive supplementations before we file the motion, we will consider them as appropriate. If we receive nothing, as we have repeatedly following your misrepresentations, we will file the motion as matters stand currently.

Sincerely,
Norbert Stahl

Gary Eastman <garyeastman@sbcglobal.net> wrote:

Mr. Stahl:

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We provided timely responses to your Discovery requests. Due to the unavailability of personnel, we communicated with you directly that our Responses would be supplemented with additional information as it was discovered or became available, as is required by the Federal Rules of Civil Procedure. Since that date, we have been in periodic communication regarding our providing the supplemental Responses and information. When I spoke with you yesterday via telephone, I indicated we had collected, stamped, and were providing via FedEx documents responsive to your Requests for Production. I also indicated we were reviewing our supplemental Responses to Requests for Admission, Request for Production, and Interrogatories, and would provide you with the signed supplemental Responses immediately upon receipt.

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Regards,

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Regards,

Gary L. Eastman, Esq., APLC
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Sent: Monday, September 17, 2007 3:02 PM
To: Gary Eastman
Subject: Live Ventures v Saroj

Dear Mr. Eastman:

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With best regards,

Norbert Stahl

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Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT L



Print - Close Window

From: "Gary Eastman" <garyeastman@sbcglobal.net>
To: nstahl@patentlawservice.com
CC: "Gary Eastman" <garyeastman@sbcglobal.net>
Subject: Supplemental Discovery Responses
Date: Thu, 20 Sep 2007 20:04:23 -0700

Dear Mr. Stahl:

Attached please find PDF versions of the Supplemental Discovery Responses, including Request for Production of Documents, Interrogatories, and Requests for Admissions. Also, executed copies of the Certification pages for each of those documents are provided in TIFF format. The original documents have been placed in the mail for your records.

Thank you for your patience.

Regards,

Gary L. Eastman, Esq., APLC
707 Broadway Street, Suite 1800
San Diego, CA 92101
(619) 230-1144
Fax (619) 230-1194
garyeastman@sbcglobal.net

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No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.487 / Virus Database: 269.13.27/1020 - Release Date: 9/20/2007 12:07 PM

Attachments

Files:

-  **Saroj_Response_to_RFProduction_Set_1_First_Supp.pdf** (155k)
-  **Saroj_Response_to_Interrogatories_Set_1_First_Supp.pdf** (70k)
-  **Saroj_Response_to_RFAdmissions_Set_1_First_Supp.pdf** (144k)
-  **Saroj_Supp_RFA_Certification_001.tif** (102k)
-  **Saroj_Supp_RFP_Certification.tif** (67k)
-  **Saroj_Supp_Int_Certification.tif** (95k)

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT M

TRADEMARK

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

LIVE VENTURES, INC.
Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.
Registrant.

Registration No: 3143997

Registration No: 3147241

Registration No: 3158549

CANCELLATION NO: 92047661

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
FIRST SUPPLEMENTAL
RESPONSE TO PETITIONER'S FIRST SET OF INTERROGATORIES**

Registrant Saroj International's First Supplemental Response to
Petitioner's First Set of Interrogatories

I. General Objections

The following general objections are continuing in nature and shall apply to each Request and shall be incorporated into each response. Each individual Response is made subject to, and without waiver of, such general objection.

1. Saroj International, Inc.'s Responses herein are based upon the facts it knows at this time. Saroj International, Inc. may become aware of additional data, documentation and/or other and more specific facts which may be material to its Responses herein. Accordingly, Saroj International, Inc. reserves its rights to supplement or modify these Responses, in its sole discretion.
2. Saroj International, Inc. objects generally to the First Set as overly broad, unduly and oppressive insofar as Petitioner seeks to discover information about matters not relevant to the subject matter of this action, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of its objections, Saroj International, Inc. will respond to the extent the First Set is relevant to the subject matter of this action, or is reasonably calculated to lead to the discovery of admissible evidence.
3. Saroj International, Inc. objects generally to the First Set insofar as it may be construed as calling for the disclosure of material or information which is privileged and/or reflect attorney work product. To the extent Responses would include privileged or protected information, Saroj International, Inc. will not respond.
4. Saroj International, Inc. objects generally to the First Set as overly broad,

unduly burdensome, oppressive, vague, ambiguous and uncertain insofar as the instructions and definitions used in the First Set purport to impose obligations on Saroj International, Inc. beyond the scope of Rule 33. Without waiver of its objections, Saroj International, Inc. will respond consistent with the requirements of Rule 33.

5. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is not clearly identified or is not identified with sufficient particularity. Without waiver of its objections, Saroj International, Inc. has made reasonable interpretations of Petitioner's intended meanings, and will respond accordingly to such interpretations as set forth below.

6. Saroj International, Inc. objects generally to the First Set to the extent that does not specify a time period for any of the information sought.

7. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is keenly proprietary and represents trade secret information under State and Federal Law including the Uniform Trades Secrets Act, the disclosure of which will not be made unless a suitable Protective Order is in place.

II. Responses to Interrogatories

Interrogatory No. 1

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR

USE of the 997 MARK for backpacks prior to March 5, 2005.

Response to Interrogatory No. 1

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 2

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for wallets prior to March 5, 2005.

Response to Interrogatory No. 2

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 3

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for t-shirts prior to March 5, 2005.

Response to Interrogatory No. 3

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 4

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for swimwear prior to March 5, 2005.

Response to Interrogatory No. 4

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 5

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for socks prior to March 5, 2005.

Response to Interrogatory No. 5

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances

identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 6

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for shoes prior to March 5, 2005.

Response to Interrogatory No. 6

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 7

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for hats prior to March 5, 2005.

Response to Interrogatory No. 7

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to

provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 8

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for scarves prior to March 5, 2005.

Response to Interrogatory No. 8

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 9

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for coats prior to March 5, 2005.

Response to Interrogatory No. 9

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 10

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for jackets prior to March 5, 2005.

Response to Interrogatory No. 10

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 11

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for rainwear prior to March 5, 2005.

Response to Interrogatory No. 11

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 12

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR

USE of the 997 MARK for gloves prior to March 5, 2005.

Response to Interrogatory No. 12

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 13

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK for denim jeans prior to March 5, 2005.

Response to Interrogatory No. 13

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. worked with designer in LA to create accessories and tags for denim line; worked with manufacturers in Hong Kong in early 2003 to make denim samples; and worked with an independent sales rep, Walter Osband, to attempt to sell jeans to retail/wholesale customers. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 14

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for backpacks prior to March 5, 2005.

Response to Interrogatory No. 14

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 15

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for wallets prior to March 5, 2005.

Response to Interrogatory No. 15

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 16

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR
USE of the 241 MARK for t-shirts prior to March 5, 2005.

Response to Interrogatory No. 16

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 17

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for swimwear prior to March 5, 2005.

Response to Interrogatory No. 17

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 18

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for socks prior to March 5, 2005.

Response to Interrogatory No. 18

Saroj International, Inc. has made a diligent search and reasonable inquiry

has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 19

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for shoes prior to March 5, 2005.

Response to Interrogatory No. 19

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 20

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for hats prior to March 5, 2005.

Response to Interrogatory No. 20

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information

responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 21

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for scarves prior to March 5, 2005.

Response to Interrogatory No. 21

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 22

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for coats prior to March 5, 2005.

Response to Interrogatory No. 22

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall

provide such supplemental Responses when appropriate.

Interrogatory No. 23

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for jackets prior to March 5, 2005.

Response to Interrogatory No. 23

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 24

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for rainwear prior to March 5, 2005.

Response to Interrogatory No. 24

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 25

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for gloves prior to March 5, 2005.

Response to Interrogatory No. 25

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 26

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK for denim jeans prior to March 5, 2005.

Response to Interrogatory No. 26

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. worked with designer in LA to create accessories and tags for denim line; worked with manufacturers in Hong Kong in early 2003 to make denim samples; and worked with an independent sales rep, Walter Osband, to attempt to sell jeans to retail/wholesale customers. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 27

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 549 MARK for retail clothing boutiques prior to November 30, 2005.

Response to Interrogatory No. 27

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. negotiated a lease agreement for store in July 2005; secured a City of Pasadena business license issued August 2005; completed construction for retail store early November 2005; secured orders for merchandise Summer 2005; advertised the store in local print, radio and internet media; advertised for and hired a workforce for the store; and sold merchandise through the store. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 28

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 997 MARK.

Response to Interrogatory No. 28

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Internet

domain name was secured and website was established for www.east13.com; advertisement for merchandise was presented on the website clearly bearing the 997 mark; agreements were negotiated in order to market and position www.east13.com within internet search engines; merchandise was advertised and sold using the www.eastt13.com website. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 29

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 241 MARK.

Response to Interrogatory No. 29

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: graphic artist was identified and contracted to develop EAST13 logo for use on clothing line; clothing was designed and samples were ordered and secured for clothing line bearing the EAST13 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 30

Describe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of the 549 MARK.

Response to Interrogatory No. 30

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. negotiated a lease agreement for store in July 2005; secured a City of Pasadena business license issued August 2005; completed construction for retail store early November 2005; secured orders for merchandise Summer 2005; advertised the store in local print, radio and internet media; advertised for and hired a workforce for the store; and sold merchandise through the store. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 31

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 997 MARK.

Response to Interrogatory No. 31

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 32

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 241 MARK.

Response to Interrogatory No. 32

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory, but have been unable to ascertain any information responsive to the interrogatory. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 33

Provide quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the 549 MARK.

Response to Interrogatory No. 33

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds:

- | | |
|------------|-------------|
| A. Q4 2005 | \$10,633.93 |
| B. Q1 2006 | \$55,377.31 |
| C. Q2 2006 | \$42,838.38 |
| D. Q3 2006 | \$81,316.85 |
| E. Q4 2006 | \$69,252.03 |

F. Q1 2007	\$79,684.42
G. Q2 2007	\$101,167.07
H. Q3 2007	\$26,987.23

Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 34

IDENTIFY all PERSONS that have ever USED the 997 MARK.

Response to Interrogatory No. 34

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is, and has always been, the sole user of the 997 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 35

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 34, describe the USE of the 997 MARK by such PERSON.

Response to Interrogatory No. 35

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is the sole user of the 997 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 36

IDENTIFY all PERSONS that have ever USED the 241 MARK.

Response to Interrogatory No. 36

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is, and has always been, the sole user of the 241 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 37

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 36, describe the USE of the 241 MARK by such PERSON.

Response to Interrogatory No. 37

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is the sole user of the 241 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 38

IDENTIFY all PERSONS that have ever USED the 549 MARK.

Response to Interrogatory No. 38

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is, and has always been, the sole user of the 549 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Interrogatory No. 39

If any PERSON other than Saroj International, Inc. is IDENTIFIED in response to INTERROGATORY NO. 38, describe the USE of the 549 MARK by such PERSON.

Response to Interrogatory No. 39

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to ascertain all relevant facts and circumstances identified in this interrogatory. Saroj International, Inc. responds: Saroj International, Inc. is the sole user of the 549 mark. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Dated: September _____, 2007

By: _____
Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

GARY L. EASTMAN, APLC
707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone: (619) 230-1144
Facsimile: (619) 230-1194

Certification

I, Jaivin Karnani, am an Officer of Saroj International, Inc., and in that capacity, have provided responses to the above Interrogatories. The above responses are made following reasonable inquiry and investigation. I swear under the penalty of perjury that the above is true and correct.

Dated: September _____, 2007

Jaivin Karnani

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing FIRST SUPPLEMENTAL Response to First Set of Interrogatories has been served on PETITIONER LIVE VENTURES, INC. by

mailing said copy on September _____, 2007 via First Class Mail, postage prepaid to:

NORBERT STAHL, ESQ
STAHL LAW FIRM
2 MEADOWSWEET LANE
SAN CARLOS, CALIFORNIA 94070.

Dated: September _____, 2007

By: _____
Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT N

TRADEMARK

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

LIVE VENTURES, INC.
Petitioner,

Adv.

SAROJ INTERNATIONAL, INC.
Registrant.

Registration No: 3143997
Registration No: 3147241
Registration No: 3158549

CANCELLATION NO: 92047661

**REGISTRANT SAROJ INTERNATIONAL, INC.'S
FIRST SUPPLEMENTAL
RESPONSE TO PETITIONER'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS**

I. General Objections

The following general objections are continuing in nature and shall apply to each Request and shall be incorporated into each response. Each individual Response is made subject to, and without waiver of, such general objection.

1. Saroj International, Inc.'s Responses herein are based upon the facts it knows at this time. Saroj International, Inc. may become aware of additional data, documentation and/or other and more specific facts which may be material to its Responses herein. Accordingly, Saroj International, Inc. reserves its rights to supplement or modify these Responses, in its sole discretion.

2. Saroj International, Inc. objects generally to the First Set as overly broad, unduly and oppressive insofar as Petitioner seeks to discover information about matters not relevant to the subject matter of this action, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of its objections, Saroj International, Inc. will respond to the extent the First Set is relevant to the subject matter of this action, or is reasonably calculated to lead to the discovery of admissible evidence.

3. Saroj International, Inc. objects generally to the First Set insofar as it may be construed as calling for the disclosure of material or information which is privileged and/or reflect attorney work product. To the extent Responses would include privileged or protected information, Saroj International, Inc. will not respond.

4. Saroj International, Inc. objects generally to the First Set as overly broad,

unduly burdensome, oppressive, vague, ambiguous and uncertain insofar as the instructions and definitions used in the First Set purport to impose obligations on Saroj International, Inc. beyond the scope of Rule 33. Without waiver of its objections, Saroj International, Inc. will respond consistent with the requirements of Rule 33.

5. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is not clearly identified or is not identified with sufficient particularity. Without waiver of its objections, Saroj International, Inc. has made reasonable interpretations of Petitioner's intended meanings, and will respond accordingly to such interpretations as set forth below.

6. Saroj International, Inc. objects generally to the First Set to the extent that does not specify a time period for any of the information sought.

7. Saroj International, Inc. objects generally to the First Set as overly broad, unduly burdensome and oppressive insofar as information requested is keenly proprietary and represents trade secret information under State and Federal Law including the Uniform Trades Secrets Act, the disclosure of which will not be made unless a suitable Protective Order is in place.

II. Responses to Requests for Production

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first

USE of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and

cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the DATE and NATURE of YOUR first USE of the 549 MARK for retail clothing boutiques.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically #2-34, 42-49, and 56-83. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 5

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International Inc. responds as follows: Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to show the VOLUME OF SALES in COMMERCE per quarter, beginning January 1, 2001 until the present, of goods through retail clothing boutiques under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically, 52-55, 84-87, 89-91, 95-100, 102-119, 124-130, 145-151, and 152-155. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 7

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, but has been unable to locate any item responsive to the Request. Saroj International, Inc. will honor its

duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 8

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before March 5, 2005, of the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 9

DOCUMENTS sufficient to show the extent, NATURE and frequency of YOUR USE before November 30, 2005, of the 549 MARK for retail clothing boutiques.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for handbags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tote bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 12

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for traveling bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 13

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 14

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 15

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 16

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 17

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 18

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 19

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 20

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bras

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 21

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 22

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 23

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 24

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 25

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 28

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 29

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for t-shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 31

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for skirts

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 34

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tap pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 36

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 38

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for stockings before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 39

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 40

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 41

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for socks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for

footwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 43

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 44

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for caps before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 45

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for hats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 47

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 48

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for cots before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 49

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 50

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 51

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for gloves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 52

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for denim jeans before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 53

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for tights

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 54

DOCUMENTS sufficient to show YOUR USE of the 997 MARK for teddies with garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 55

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for handbags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 56

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tote bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 57

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for traveling bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 58

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoulder bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 59

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for clutch purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 60

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for all-purpose athletic bags before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 61

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for backpacks before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 62

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for wallets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 63

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coin purses before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for

cosmetic bags sold empty before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 65

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bras before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 66

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for panties before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 67

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for slips before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 68

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for camisoles before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 69

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 70

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for nightgowns before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 71

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pajamas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 72

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sleep shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 73

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for robes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 74

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 75

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for t-shirts

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 76

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for skirts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 77

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for swimwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 78

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bodysuits before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 79

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tap pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 80

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pants before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 81

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for sarongs before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 82

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for garter belts before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 83

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for stockings before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 84

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hosiery before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 85

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for pantyhose before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 86

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for socks

before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 87

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for footwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 88

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for shoes before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 89

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for caps before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 90

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for hats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 91

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for bandannas before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 92

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for scarves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 93

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for coats before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 94

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for jackets before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 95

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for rainwear before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 96

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for gloves before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 97

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for denim

jeans before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 98

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for tights before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 99

DOCUMENTS sufficient to show YOUR USE of the 241 MARK for teddies with garters before March 5, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 100

DOCUMENTS sufficient to show YOUR USE of the 549 MARK for retail clothing boutiques before November 30, 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically, 52-55, 84-87, 89-91, 95-100, 102-119, 124-130, 145-151, and 152-155. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 101

DOCUMENTS YOU referred to, used or relied on to answer any of PETITIONER'S interrogatories to YOU.

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 102

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 997 MARK for each

and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slippers, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 102:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically, 52-55, 84-87, 89-91, 95-100, 102-119, 124-130, 145-151, and 152-155. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 103

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote

bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slippers, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 103:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 104

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slippers, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter

belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 104:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 105

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 105:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 106

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 997 MARK for each and all of the goods listed in the 997 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 106:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no

such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 107

DOCUMENTS that IDENTIFY each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the 241 MARK for each and all of the goods listed in the 241 REGISTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 107:

Saroj International, Inc. objects to this Request as being overly broad, ambiguous, and vague. Despite this objection, Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 108

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of any goods under the 997 MARK for each and all of the goods listed in the 997 REIGSTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear, bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garter belts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 108:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of any goods under the 241 MARK for each and all of the goods listed in the 241 REIGSTRATION, namely handbags, tote bags, traveling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags sold empty, and bras, panties, slips, camisoles, teddies, nightgowns, pajamas, sleep shirts, robes, shirts, t-shirts, skirts, swimwear,

bodysuits, tap pants, pants, sarongs, garter belts, stockings, hosiery, pantyhose, socks, footwear, shoes, caps, hats, bandannas, scarves, coats, jackets, rainwear, gloves, denim jeans, tights and teddies with garters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 109:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 110

DOCUMENTS that REFER to or RELATE to advertising in COMMERCE of the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 110:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174, and specifically, 52-55, 84-87, 89-91, 95-100, 102-119, 124-130, 145-151, and 152-155. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 111

All documents that REFER or RELATE to the PETITION.

RESPONSE TO REQUEST FOR PRODUCTION NO. 111:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 112

All documents that REFER or RELATE to the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 112:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 113

All documents that REFER or RELATE to any relief sought in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 113:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some

documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 114

All documents that REFER or RELATE to the allegations in paragraph numbered 13 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 114:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 115

All documents that REFER or RELATE to the allegations in paragraph numbered 14 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 115:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses

under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 116

All documents that REFER or RELATE to the allegations in paragraph numbered 15 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 116:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 117

All documents that REFER or RELATE to the allegations in paragraph numbered 16 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 117:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. . Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 118

All documents that REFER or RELATE to the allegations in paragraph numbered 17 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 118:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 119

All documents that REFER or RELATE to the allegations in paragraph numbered 18 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 119:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time which would be related to Petitioner's allegations that Saroj International, Inc.'s '549 Registration and Petitioner's '708 Application are in the same trade channels. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 120

All documents that REFER or RELATE to the allegations in paragraph numbered 19 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 120:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 121

All documents that REFER or RELATE to the allegations in paragraph numbered 22 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 121:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 122

All documents that REFER or RELATE to the allegations in paragraph numbered 23 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 122:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 123

All documents that REFER or RELATE to the allegations in paragraph numbered 24 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 123:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 124

All documents that REFER or RELATE to the allegations in paragraph numbered 25 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 124:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 125

All documents that REFER or RELATE to the allegations in paragraph numbered 27 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 125:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 126

All documents that REFER or RELATE to the allegations in paragraph numbered 29 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 126:

Saroj International, Inc. has made a diligent search and reasonable inquiry

has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 127

All documents that REFER or RELATE to the allegations in paragraph numbered 31 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 127:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 128

All documents that REFER or RELATE to the allegations in paragraph numbered 33 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 128:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such

supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 129

All documents that REFER or RELATE to the allegations in paragraph numbered 34 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 129:

Saroj International, Inc. has made a diligent search and reasonable inquiry has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 130

All documents that REFER or RELATE to the allegations in paragraph numbered 35 in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 130:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 131

All documents that REFER or RELATE to the affirmative defenses in the ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 131:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 132

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 132:

Saroj International, Inc. continues its objections to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 133

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 133:

Saroj International, Inc. continues its objections to this Request as it seeks to discover documents which would be privileged and/or confidential and not

subject to discovery.

REQUEST FOR PRODUCTION NO. 134

All documents that REFER or RELATE to any investigation, analysis, determination, or opinion concerning the scope, validity or invalidity, infringement or non infringement, or enforceability or unenforceability of the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 134:

Saroj International, Inc. continues its objections to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 135

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 997 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 135:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 136

All documents that REFER or RELATE to any past or present, actual,

planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 241 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 136:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 137

All documents that REFER or RELATE to any past or present, actual, planned, proposed, expected, or projected business venture, alliance, license, offer to license, assignment, offer to assign, or other agreement between REGISTRANT and any third party RELATED to the 549 MARK, including any negotiations or communications RELATING thereto.

RESPONSE TO REQUEST FOR PRODUCTION NO. 137:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 138

All documents that REFER or RELATE to REGISTRANT's decision to

oppose the PETITION, including memoranda, investigations, reports, opinions, and statements by third parties relied upon by REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 138:

Saroj International, Inc. continues its objection to this Request as it seeks to discover documents which would be privileged and/or confidential and not subject to discovery.

REQUEST FOR PRODUCTION NO. 139

An electronic copy of each version and page of any website of REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 139:

Saroj International, Inc. will produce a document or documents responsive to this Request. See documents produced bearing Bates Stamp #0002.

REQUEST FOR PRODUCTION NO. 140

All documents that comprise, REFER to, RELATE to, or reflect upon any license agreement to which REGISTRANT is a party concerning any trademark.

RESPONSE TO REQUEST FOR PRODUCTION NO. 140:

Saroj International, Inc. has conducted a diligent search and reasonable investigation, and is continuing its investigation; however, it appears no such documents exist at this time. Saroj International, Inc. will continue its investigation, and will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 141

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 141:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 142

All documents that REFER to, RELATE to, or reflect upon any attempts by REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 142:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 143

All documents that REFER to, RELATE to, or reflect upon any attempts by

REGISTRANT to obtain a license, or arrange a joint venture or other cooperative effort, or agreement to manufacture, market, sell or offer for sale any goods under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 143:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 144

All documents that REFER to, RELATE to, or reflect upon each and every trademark license granted by REGISTRANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 144:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 145

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 997 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 145:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International,

Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 146

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 241 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 146:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 147

All documents REFERRING or RELATING to any of REGISTRANT's marketing programs or plans regarding goods under the 549 MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 147:

Saroj International, Inc. has conducted a diligent search and reasonable investigation; however, it appears no such documents exist. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

REQUEST FOR PRODUCTION NO. 148

All documents REGISTRANT intends to use or may use at trial.

RESPONSE TO REQUEST FOR PRODUCTION NO. 148:

Saroj International, Inc. has made a diligent search and reasonable inquiry

has been made in an effort to locate the item requested, and has located some documents responsive to the Request. See documents produced bearing Bates Stamp # 1-174. Saroj International, Inc. will honor its duty to provide supplement discovery Responses under FRCP 26(e)(1), and shall provide such supplemental Responses when appropriate.

Dated: September _____, 2007

By: _____
Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

GARY L. EASTMAN, APLC
707 Broadway Street, Suite 1800
San Diego, California 92101
Telephone: (619) 230-1144
Facsimile: (619) 230-1194

Certification

I, Jaivin Karnani, am an Officer of Saroj International, Inc., and in that capacity, have provided responses to the above Requests for Admissions. The above responses are made following reasonable inquiry and investigation. I swear under the penalty of perjury that the above is true and correct.

Dated: September _____, 2007

Jaivin Karnani

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing FIRST SUPPLEMENTAL Response to First Set of Requests for Production has been served on PETITIONER LIVE VENTURES, INC. by

mailing said copy on September _____, 2007 via First Class Mail, postage prepaid to:

NORBERT STAHL, ESQ
STAHL LAW FIRM
2 MEADOWSWEET LANE
SAN CARLOS, CALIFORNIA 94070.

Dated: September _____, 2007

By: _____
Gary L. Eastman, Esq.
Attorney for Registrant Saroj International, Inc.
Registration No. 41,005

Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT O



Print - Close Window

Date: Wed, 26 Sep 2007 10:23:58 -0700 (PDT)
From: nstahl@patentlawservice.com
Subject: Re: Supplemental Discovery Responses
To: "Gary Eastman" <garyeastman@sbcglobal.net>

Dear Mr. Eastman:

We have not yet received signed copies of the supplemental responses to our discovery requests. We cannot open the TIFF format files. Please email pdf versions of the executed signature pages for the responses and the proofs of service. Thank you.

Sincerely,
Norbert Stahl

Gary Eastman <garyeastman@sbcglobal.net> wrote:

Dear Mr. Stahl:

Attached please find PDF versions of the Supplemental Discovery Responses, including Request for Production of Documents, Interrogatories, and Requests for Admissions. Also, executed copies of the Certification pages for each of those documents are provided in TIFF format. The original documents have been placed in the mail for your records.

Thank you for your patience.

Regards,

Gary L. Eastman, Esq., APLC
707 Broadway Street, Suite 1800
San Diego, CA 92101
(619) 230-1144
Fax (619) 230-1194
garyeastman@sbcglobal.net

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Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT P

STAHL LAW FIRM

Intellectual Property Representation

September 27, 2007

Gary L. Eastman, APLC
707 Broadway Street, Ste 1800
San Diego, CA 92101

<p>PER FACSIMILE To: (619) 230-1194 Total Page(s): 4</p>

Re: LIVE VENTURES INC. v. SAROJ INTERNATIONAL, INC.
Trademark Cancellation Proceeding No. 92047661

Dear Mr. Eastman:

We am writing with respect to various deficiencies in Saroj International, Inc.'s first supplemental responses to Live Ventures Inc.'s Interrogatories and Requests for Production of Documents and Things and to demand that Saroj cures these deficiencies by October 4, 2007. We are writing this letter in satisfaction of our meet and confer obligations prior to filing a motion with the Board for an order to compel.

I. Interrogatories:

a. Interrogatories Nos. 1-12, 14-25, 31, 32: Saroj responded to these interrogatories by stating that it has "been unable to ascertain any information responsive to the interrogatory." This response to these interrogatories is deficient.

Interrogatories Nos. 1-12 and 14-25 ask to "[d]escribe ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE of" the '997 mark or the '241 mark for a specified product "prior to March 5, 2005." If Saroj did not use the marks for the specified products prior to March 5, 2005, then Saroj should state that in its response. However, Saroj must know if it did use the mark for the specified products at the time or not. Live Ventures thus demands that Saroj amend its responses by October 4, 2007.

Interrogatories Nos. 31 and 32 ask for "quarterly sales figures in COMMERCE beginning January 1, 2001, for goods under the" '997 mark and the '241 mark. Saroj must know if and how much it sold under the '997 mark and the '241 mark. Saroj provided such sales figures for the '549 mark and Saroj thus is aware of the information sought. If the sales

figures asked for are zero, then Saroj should so state. Live Ventures thus demands that Saroj amend its responses by October 4, 2007.

b. Interrogatories Nos. 13, 26, 27: These interrogatories inquire about “ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR USE” of the ‘997 mark and the ‘241 mark for denim jeans prior to March 5, 2005 (Nos. 13 and 26) and the ‘549 mark for retail clothing boutiques prior to November 30, 2005 (No. 27).

Saroj’s responses are not sufficient for a complete evaluation of USE of the marks. The definitions in Live Ventures’ interrogatories define “‘ALL RELEVANT FACTS AND CIRCUMSTANCES,’ when employed with reference to the USE of a trademark, means all information that is relevant to evaluating the USE of the trademark.” The term USE is defined as “‘USE,’ when employed with reference to a trademark, means the use of the trademark in accordance with 15 U.S.C. § 1051(a).”

If Saroj’s responses to interrogatories 13, 26 and 27 provide everything that Saroj intends to rely on to support an allegation of USE, then the responses are sufficient. If Saroj intends to rely on any information that is not included in its responses, then Saroj should amend its responses. Live Ventures thus demands that Saroj by October 4, 2007 either confirm that it does not rely on any additional information or that Saroj amend its responses by October 4, 2007.

c. Interrogatories Nos. 28-30: These interrogatories ask for “ALL RELEVANT FACTS AND CIRCUMSTANCES of YOUR **first** USE” (bold and underlining added) of Saroj’s three trademarks at issue, the ‘997 mark, the ‘241 mark, and the ‘549 mark. In its supplemental responses, Saroj deletes the word “first” from the interrogatories and thus rewrites the interrogatories.

Saroj’s responses fail to provide all relevant facts and circumstances of the **first** use, *i.e.*, use “in accordance with 15 U.S.C. § 1051(a)” as the term “USE” is defined in the interrogatories. Saroj’s responses to interrogatories Nos. 28 and 29 provide no dates at all, let alone when the first use allegedly took place. Saroj’s responses to interrogatories Nos. 28-30 fail to state which use Saroj alleges satisfies the conditions of 15 U.S.C. § 1051(a) and all relevant facts and circumstances surrounding that use, including when it took place. We note that 15 U.S.C. § 1051(a) refers to use in “commerce” and that “commerce” is defined in 15 U.S.C. § 1127 as “all commerce which may lawfully be regulated by Congress.” Live Ventures demands that Saroj provide complete responses by October 4, 2007.

d. Interrogatory No. 33: Please confirm that the sales figures provided in this interrogatory are for sales in “COMMERCE,” which is defined in 15 U.S.C. § 1127 as “all commerce which may lawfully be regulated by Congress.” Live Ventures demands such confirmation by October 4, 2007.

II. Requests for Documents:

a. Requests Nos. 1, 2, 3 – DATE and NATURE of first USE: Saroj has failed to produce any documents that provide the DATE (“day, month and year of the use, or as much of that information as possible”) and NATURE (“how the trademark was used, e.g., was the trademark used on a product, in a brochure, in a website, in a letter, or in any other way”) of the first USE (“use of the trademark in accordance with 15 U.S.C. § 1051(a)”). Live Ventures thus demands production of all responsive documents and things by October 4, 2007.

b. Requests Nos. 4, 5, 6 – VOLUME OF SALES in COMMERCE per quarter: Saroj has failed to produce any documents that provide the VOLUME OF SALES (“dollar amount of sales, *i.e.*, how much was billed for the sales and how much was paid for the sales; also the number of goods sold, *e.g.*, the number of each of the goods listed on the trademark registration inquired about”) in COMMERCE (“commerce in accordance with 15 U.S.C. § 1127”) per quarter. Live Ventures thus demands production of all responsive documents and things by October 4, 2007.

c. Requests Nos. 7, 8, 9 – extent, NATURE and frequency of USE: Saroj has failed to produce any documents showing the extent, NATURE and frequency of its USE of the three Saroj marks at issue. Live Ventures thus demands production of all responsive documents and things by October 4, 2007.

d. Requests Nos. 10-100 – USE of the marks for listed products: Saroj has failed to produce any documents showing the USE (“use of the trademark in accordance with 15 U.S.C. § 1051(a)”) of its marks at issue for the products listed on Saroj’s registrations. Live Ventures thus demands production of all responsive documents and things by October 4, 2007.

e. Requests Nos. 102-109 – offers, sales, supplies, advertisement of products under the marks: Saroj has failed to produce any documents showing (i) “each and every PERSON to whom YOU have ever offered in COMMERCE for sale goods under the” ‘997 mark and the ‘241 mark; (ii) “each and every PERSON to whom YOU have ever sold in COMMERCE any goods under the” ‘997 mark and the ‘241 mark; (iii) “each and every PERSON to whom YOU have ever supplied in COMMERCE any goods under the” ‘997 mark and the ‘241 mark; and (iv) documents that “REFER to or RELATE to advertising in COMMERCE of any goods under the” ‘997 mark and the ‘241 mark. Live Ventures thus demands production of all responsive documents and things by October 4, 2007.

f. Requests Nos. 111-131 – the pleadings: Saroj has failed to produce all or any documents responsive to these requests. If Saroj alleges that it has produced all responsive documents, then Live Ventures demands that Saroj confirm by October 4, 2007 that it takes that position. Otherwise, Live Ventures demands that Saroj produce all responsive documents and things by October 4, 2007.

g. Requests Nos. 135-137, 141-143, 145-147 – any agreements, marketing, plans regarding goods under the marks: Saroj has failed to produce any documents responsive to these requests. Ventures thus demands production of all responsive documents and things by October 4, 2007.

Also, we have not yet received signed copies of the supplemental responses to Live Ventures' interrogatories, document requests and requests for admissions. We request signed copies by October 4, 2007.

We will move for an order compelling the requested discovery, or any discovery that is still missing, after October 4, 2007.

Sincerely,



Norbert Stahl

*** TX REPORT ***

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DESTINATION TEL # 16192301194
DESTINATION ID
ST. TIME 09/27 14:10
TIME USE 00:56
PAGES SENT 4
RESULT OK

STAHL LAW FIRM

Intellectual Property Representation

September 27, 2007

Gary L. Eastman, APLC
707 Broadway Street, Ste 1800
San Diego, CA 92101

PER FACSIMILE
To: (619) 230-1194
Total Page(s): 4

Re: LIVE VENTURES INC. V. SAROJ INTERNATIONAL, INC.
Trademark Cancellation Proceeding No. 92047661

Dear Mr. Eastman:

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I. Interrogatories:

a. Interrogatories Nos. 1-12, 14-25, 31, 32: Saroj responded to these interrogatories by stating that it has "been unable to ascertain any information responsive to the interrogatory." This response to these interrogatories is deficient.

Interrogatories Nos. 1-12 and 14-25 ask to "[d]escribe ALL RELEVANT FACTS AND CIRCUMSTANCES OF YOUR LIFE SINCE 1997 WITH RESPECT TO THE [2001] [2002] [2003] [2004] [2005] [2006] [2007] [2008] [2009] [2010] [2011] [2012] [2013] [2014] [2015] [2016] [2017] [2018] [2019] [2020] [2021] [2022] [2023] [2024] [2025] [2026] [2027] [2028] [2029] [2030] [2031] [2032] [2033] [2034] [2035] [2036] [2037] [2038] [2039] [2040] [2041] [2042] [2043] [2044] [2045] [2046] [2047] [2048] [2049] [2050] [2051] [2052] [2053] [2054] [2055] [2056] [2057] [2058] [2059] [2060] [2061] [2062] [2063] [2064] [2065] [2066] [2067] [2068] [2069] [2070] [2071] [2072] [2073] [2074] [2075] [2076] [2077] [2078] [2079] [2080] [2081] [2082] [2083] [2084] [2085] [2086] [2087] [2088] [2089] [2090] [2091] [2092] [2093] [2094] [2095] [2096] [2097] [2098] [2099] [2100] [2101] [2102] [2103] [2104] [2105] [2106] [2107] [2108] [2109] [2110] [2111] [2112] [2113] [2114] [2115] [2116] [2117] [2118] [2119] [2120] [2121] [2122] [2123] 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Cancellation No.: 92047661

LIVE VENTURES, INC. v. SAROJ INTERNATIONAL, INC.

Party Offering Exhibit: Live Ventures, Inc.

EXHIBIT Q



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Date: Thu, 4 Oct 2007 10:51:41 -0700 (PDT)
From: nstahl@patentlawservice.com
Subject: Live Ventures v Saroj International
To: "Gary Eastman" <garyeastman@sbcglobal.net>

Dear Mr. Eastman:

You have not responded in any way to our letter of September 27, 2007, giving you notice of various deficiencies in Saroj's discovery responses. You also failed to provide us with signed and verified supplemental responses and we only have unsigned and unverified supplemental responses. As a result of your failure to cooperate in discovery, we are filing our motion to compel today.

Sincerely,

Norbert Stahl, Esq.
Stahl Law Firm
2 Meadowsweet Ln
San Carlos, CA 94070
(650) 802-8800 (phone)
(650) 802-8484 (fax)
www.patentlawservice.com

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