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

Proceeding	92049676
Party	Plaintiff Paramount Bed Company, Limited
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Date	11/05/2008
Attachments	INITIAL DISCLOSURES.PDF ( 3 pages )(89313 bytes )

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

PARAMOUNT BED COMPANY, LIMITED,	: X	
	:	
Petitioner,	:	Cancellation No. 92049676
	:	(Registration No. 1,542,562)
v.	:	
	:	
DREAMWELL, LTD.,	:	
	:	
Respondent.	:	
	: X	

**PETITIONER PARAMOUNT BED COMPANY'S INITIAL DISCLOSURES**

Petitioner, Paramount Bed Company ("Paramount") by its undersigned attorneys hereby makes its Initial Disclosures, in accordance with 37 C.F.R. § 2.120(a) and Rule 26(a)(1) of the Federal Rules of Civil Procedure.

A. Provide the name and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

Paramount reasonably believes that individuals employed by Respondent whose identities are not yet known, will have discoverable information that Paramount is likely to rely on to support its claims. As discovery has not yet begun in this matter, Paramount reserves the right to supplement its initial disclosures as more information becomes available.

B. A copy of, or a description by category and location of, all documents, electronically stored information and tangible things that are in the possession, custody or control

of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Paramount reasonably believes that the majority of documents relevant to this proceeding are in the possession, custody or control of Respondent or other third parties including:

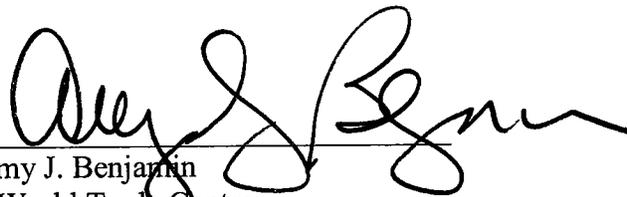
- Documents evidencing use of PARAMOUNT by Respondent.
- Advertising, promotional materials and brochures bearing the mark PARAMOUNT.
- Labels, tags and packaging bearing the mark PARAMOUNT.
- Sales documents.
- All other documents produced by Respondent during discovery.

In addition, Paramount may also rely on:

- Trademark File Wrappers for Serial No. 77/301,428 for the mark PARAMOUNT BED
- Trademark File Wrapper for Registration No. 1,542,562 for the mark PARAMOUNT.
- Assignment files for Registration No. 1,542,562 for the mark PARAMOUNT.
- Report of investigation into the use of PARAMOUNT by Respondent.

Paramount reserves the right to supplement its Initial Disclosures as more information becomes available.

DARBY & DARBY P.C.



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*Attorneys for Petitioner  
Paramount Bed Company*

Date: November 5, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing **PETITIONER PARAMOUNT BED COMPANY INITIAL DISCLOSURES** was caused to be served upon counsel for Respondent on November 5, 2008 by first-class mail, postage prepaid, addressed as follows:

W. Andrew McNeil  
Morris, Manning & Martin, LLP  
1600 Atlanta Financial Center  
3343 Peachtree Road, NE  
Atlanta, Georgia 30326

A handwritten signature in cursive script, appearing to read "W. Andrew McNeil", is written over a horizontal line.