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Filing date: **05/01/2012**

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

Proceeding	92055201
Party	Defendant Miguel A. Maya
Correspondence Address	BIANA BORUKHOVICH 1809 CONEY ISLAND AVE BROOKLYN, NY 11230 UNITED STATES Biana@bb-lawfirm.com
Submission	Motion to Compel Discovery
Filer's Name	Biana Borukhovich
Filer's e-mail	Biana@bb-lawfirm.com
Signature	/Biana Borukhovich/
Date	05/01/2012
Attachments	Discovery Request.pdf (3 pages)(1883827 bytes)

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

-----X
Plentyoffish Media Inc.

Petitioner,

-against-

Miguel A. Maya,

Respondent,
-----X

Cancellation No. 92055201

Registration No. 4099815

Docket No. 750065.808

RESPONDENT'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Rule 34 of the Federal Rules of Civil Procedure, Respondent, Miguel A. Maya, ("Respondent") requests the following documents to be provided by the Petitioner, Plentyoffish Media Inc., ("Petitioner"), within thirty (30) days from the date of service hereof. Furthermore, the documents and things shall be produced at The Law Office of Biana Borukhovich, 1809 Coney Island Ave, Brooklyn, NY 11230, within thirty (30) days from the date of service of this request.

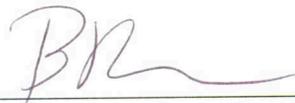
DISCOVERY REQUESTS

1. Identify all documents that will be relied upon by Petitioner in connection with its allegations of Fraud.
2. Identify all documents that will be relied upon by Petitioner in connection with its allegations of Non-Use.
3. Identify all documents that will be relied upon by Petitioner in connection with its allegations of Abandonment.
4. Identify each instance of any actual confusion by any person or business concern involving the PLENTYOFPROS mark and Petitioner's mark, PLENTYOFFISH, and identify each person who has any knowledge about such instance of confusion.
5. Identify all documents, which will be relied upon by Petitioner in connection with its allegations of a likelihood of confusion between the PLENTYOFPROS and PLENTYOFFISH marks.

6. Identify all documents that will be relied upon by Petitioner in connection with its allegations of lack of Descriptiveness.
7. Provide a document that depicts the average amount of traffic that <http://www.pof.com/> receives daily, weekly and monthly.
8. Provide a document that depicts the average amount of people that become members of <http://www.pof.com/> daily, weekly and monthly.
9. Identify and describe all services that are provided under the PLENTYOFFISH trademark.
10. State what if any action has been taken by Petitioner in connection with uses by others of PLENTYOF-containing trademark on the Internet.
11. Identify all lawsuits, oppositions, cancellations or the like involving the mark PLENTYOFFISH and/or variants thereof.
12. Produce all documents and things concerning any infringement actions and other lawsuits which have been brought or threatened by Petitioner against third party use of the PLENTYOFFISH mark, including the date of commencement of such actions, together with the complete file history and attorney's files relating to the same.
13. Produce all documents and things concerning Petitioner's efforts in policing the PLENTYOFFISH mark.

Dated this 1st Day of May 2012.

Respectfully submitted,

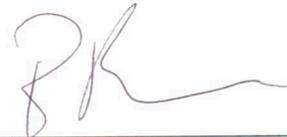
By: 
Biana Borukhovich, Esq.
1809 Coney Island Ave
Brooklyn, NY 11230
(347) 450-1811
Biana@bb-lawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May 2012, the foregoing **RESPONDENT'S**
FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS was served upon the
Petitioner by depositing same with the U.S. Postal Service, first-class postage prepaid, addressed
as follows:

Kevin S. Costanza
SEED IP Law Group PLLC
701 Fifth Avenue, Suite 5400
Seattle, Washington 98104

BY: _____



Attorney for Respondent
Biana Borukhovich, Esq.
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