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

Proceeding	92058638
Party	Defendant Southern Land Company, LLC
Correspondence Address	JAMES R MICHELS TRUST TREE LEGAL PC 1321 ADAMS ST NASHVILLE, TN 37208 UNITED STATES randy@trust-tree.com
Submission	Motion for Sanctions
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Date	03/27/2015
Attachments	Southern Land Company's Motion for Discovery Sanctions.pdf(90756 bytes)

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

LISA ALYN,)	
)	
Petitioner)	
)	
v.)	Cancellation No. 92058638
)	U.S. Registration Nos. 3,101,150
)	3,101,151
SOUTHERN LAND COMPANY, LLC)	
)	
Registrant)	
)	
)	
)	
)	

SOUTHERN LAND COMPANY’S MOTION FOR DISCOVERY SANCTIONS

Registrant Southern Land Company, LLC (“Southern Land Company”) hereby moves the Board for an Order entering sanctions against Petitioner for failing to comply with the Board’s February 4, 2015 order (the “Order”). Pursuant to the Order, Petitioner was required, within thirty days of the mailing date of the Order, to serve upon Southern Land Company supplemental verified responses to Southern Land Company’s Interrogatory Nos. 2, 8, and 15, Document Request Nos. 4, 14-21, 24, and 34-35, and Requests for Admission Nos. 21-24 and 34, without objection on the merits. Petitioner was further ordered to copy and send all responsive documents to Southern Land Company, at its own expense. The deadline to comply with the Order was March 6, 2015. The deadline passed without any action taken by Petitioner.

Based on the foregoing, Southern Land Company moves the Board for an Order barring Petitioner from relying upon or later producing documents or information at trial, or to use any information or witnesses to supply evidence on a motion or at a hearing,

where such documents, information, or witnesses were withheld from discovery. TBMP § 527.01(e). Southern Land Company also moves the Board for an Order deeming Requests for Admission Nos. 21-24 and 34 to be admitted. TBMP § 527.01(d).

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2015, a copy of Southern Land Company's Motion for Discovery Sanctions was served on counsel for Petitioner via email to:

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