

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

HAAS OUTDOORS, INC.,)	
)	
Plaintiff,)	Opposition No. 123,651
)	Serial No.: 76/123,118
v.)	Mark: ADVANTAGE TIMBER HD
)	
JORDAN OUTDOOR ENTERPRISES, LTD.,)	Opposition No. 123,413
)	Serial No. 76/123,158
Defendant.)	Mark: REALTREE HARDWOODS HD
)	

**DEFENDANT'S 30(b)(6) DEPOSITION NOTICE
TO PLAINTIFF HAAS OUTDOORS, INC.**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and the Trademark Trial and Appeal Board Manual of Procedure ("TBMP") § 404.04, commencing at 9:00 a.m. on May 3, 2002, at the offices of Haas Outdoors, Inc., 202 East Main Street, West Point, Mississippi, 39773, or other such place(s) and time(s) agreed upon by counsel for the parties, Defendant Jordan Outdoor Enterprises, Ltd. ("JOEL") will, before a court reporter duly authorized to administer oaths, through Plaintiff Haas Outdoors, Inc.'s ("Haas") officers, directors, managing agents, employees, and/or agents, conduct the deposition of such person(s) who are most knowledgeable about each of the following subjects:

1. The facts and information relating to the uses of 'HD' by Haas or any third party in connection with camouflage patterns, camouflage products or otherwise.
2. The facts and information relating to damage, if any, to Haas if the marks **ADVANTAGE TIMBER HD** and/or **REALTREE HARDWOODS HD** are registered by The Patent and Trademark Office.

3. The facts and information relating to details of the process by which Haas adopts a particular advertising campaign for a product, including the process of arriving at a description for the pattern or product.

4. The facts and information relating to Haas' method of monitoring JOEL's commercial activities.

5. The facts and information relating to when Haas first learned of JOEL's use of the term 'HD'.

6. The facts and information relating to when Haas first learned of JOEL's applications to register the marks ADVANTAGE TIMBER HD and REALTREE HARDWOODS HD.

7. The facts and information relating to Haas' process of preparing, gathering, and reviewing files for Haas' document production in response to JOEL's document requests.

8. The facts and information relating to Haas' response to JOEL's Interrogatory No. 1 that, in the camouflage and fabric industries, the term associated with 'HD' is "High Definition".

9. The facts and information relating to Haas' response to JOEL's Interrogatory No. 4 that Haas needs to use 'HD' to describe a feature of its camouflage products and why that would put Haas at a competitive disadvantage.

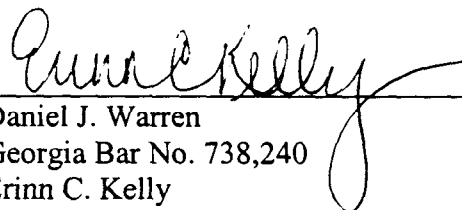
10. The facts and information relating to Haas' response to JOEL's Interrogatory No. 9 that Haas has had no communications with third parties regarding JOEL's use of the term 'HD'.

11. The facts and information relating to Haas' response to JOEL's Interrogatory No. 10 that no surveys or other studies have been performed that refer or relate to understanding of

consumer of camouflage patterns or products of the meaning of the term 'HD' when used in connection with those products.

Plaintiff Haas is requested, prior to April 30, 2002, to provide counsel for Defendant JOEL with a written designation of the name or names of the officer(s), director(s), managing agents(s), employee(s), and/or agent(s) it designates to testify concerning the matters set forth above and, for each such person, the matter(s) on which he/she will testify on Plaintiff's behalf.

Dated: April 24, 2002



Daniel J. Warren
Georgia Bar No. 738,240
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Attorneys for Defendant JOEL

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HAAS OUTDOORS, INC.,)

Plaintiff,)

v.)

JORDAN OUTDOOR ENTERPRISES, LTD.,)

Defendant.)

) Opposition No. 123,651

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) Mark: ADVANTAGE TIMBER HD

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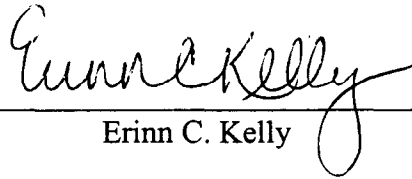
CERTIFICATE OF SERVICE

The undersigned counsel of record hereby certifies that on this day a copy of the within and foregoing **DEFENDANT'S 30(b)(6) DEPOSITION NOTICE TO PLAINTIFF HAAS OUTDOORS, INC.** was served upon counsel, properly addressed as designated below:

VIA FACSIMILE AND U.S. MAIL

W. Whitaker Rayner
WATKINS LUDLAM WINTER & STENNIS, PA
P.O. Box 427
Jackson, Mississippi 39205-0427

Dated: April 24, 2002


Erinn C. Kelly

TAB

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04-29-2002
U.S. Patent & TMO/c/TM Mail Rcpt Dt. #26

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TRADEMARK TRIAL AND
APPEAL BOARD
02 MAY - 3 PM 9:23

April 24, 2002

VIA FIRST CLASS MAIL

BOX TTAB NO FEE
Commissioner of Trademarks
2900 Crystal Drive
Arlington, Virginia 22202-3513

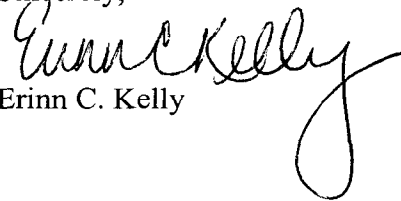
Re: U.S. Trademark Application Serial No. 76/123,158
Federal Registration of the Mark: REALTREE HARDWOODS HD
Opposition No. 123,413
Our Ref. No. 17248-0018

U.S. Trademark Application Serial No. 76/123,118
Federal Registration of the Mark: ADVANTAGE TIMBER HD
Opposition No. 123,651
Our Ref. No. 17248-0015

Dear Board:

Enclosed for your reference and docketing please find Defendant's 30(b)(6) Deposition Notice to Plaintiff Haas Outdoors, Inc., served today in the above-referenced Oppositions.

Sincerely,


Erinn C. Kelly

ECK/gop
Enclosure
cc: Daniel J. Warren, Esq.

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