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Filing date: **01/09/2009**

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

Proceeding	91186182
Party	Plaintiff Juno Manufacturing, LLC
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Submission	Other Motions/Papers
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Signature	/Susan M. Freedman/
Date	01/09/2009
Attachments	Opp. No. 91186182 Initial Disclosures.PDF (4 pages)(87180 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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In the Matter of Application Serial No. 77/351,291

Published in the *Official Gazette* May 6, 2008

JUNO MANUFACTURING, LLC,)	
)	
Opposer,)	
)	Opposition No. 91186182
v.)	
)	
JUNO ELECTRIC, INC.,)	
)	
Applicant.)	

INITIAL DISCLOSURES

Opposer Juno Manufacturing, LLC (“Juno”) makes these initial disclosures pursuant to Trademark Trial and Appeal Board (“TTAB”) Rule 2.120(a)(1) and Federal Rules of Civil Procedure Rule 26(a)(1).

These disclosures are made upon Juno’s current knowledge, understanding and belief based on information reasonably available to it. Juno continues to investigate the facts relating to this action and therefore reserves the right to revise and/or supplement these disclosures if additional evidence becomes available and/or if additional evidence is determined to be relevant to the claims.

Furthermore, these disclosures are made without prejudice to Juno’s right to use or rely on, at any time, including trial, subsequently discoverable information, or any information omitted from these disclosures by inadvertence, mistake or otherwise. Juno makes these disclosures without waiving any applicable discovery or evidentiary objections, including, without limitation, objections based upon attorney-client privilege, the work product doctrine, or any other applicable privilege, protection, or doctrine.

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT MAY BE USED IN SUPPORT OF JUNO'S CLAIMS

At present, Juno has identified the following individual who is likely to have discoverable information that may be used in support of Juno's claims:

John Petrakis
Manager, Special Projects
Juno Lighting Group 1300 S. Wolf Road
P.O. Box 5065
Des Plaines, IL 60017-5065
Phone: (847) 813-8340

Mr. Petrakis is expected to testify about the following topics:

- (1) Juno's adoption, history and use of the Juno Marks.
- (2) Juno's advertising and promotion of the goods and services offered under its Juno Marks.
- (3) Juno's sales of products and services under the Juno Marks.
- (4) The degree of consumer recognition of the Juno Marks.
- (5) Juno's efforts to enforce the Juno Marks.
- (6) Juno's registrations of the Juno Marks.

II. DOCUMENTS THAT MAY SUPPORT JUNO'S CLAIMS

At present, and without waiving any objection to the production of the following documents, including but not limited to objections based on privilege, Juno has identified the following documents that it may use to support its claims:

- (1) Certificate of Registration for Trademark No. 2,341,377 and other relevant filings.
- (2) Certificate of Registration for Trademark No. 2,336,253 and other relevant filings.
- (3) Juno's catalogs incorporating the Juno Marks.
- (4) Documents reflecting sales and advertisements incorporating the Juno Marks and placements.

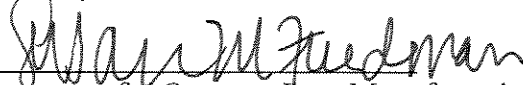
- (5) Documents regarding Juno's efforts to enforce and police the Juno Marks, including correspondence and agreements.
- (6) Documents showing Juno Electric's use/intended use of the Juno Electric mark and the channels through which Juno Electric's services will be advertised and sold.

III. INSURANCE AGREEMENTS

Juno is not aware of any applicable insurance agreements.

Dated: January 9, 2009

Respectfully Submitted,

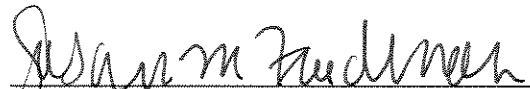
By: 
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LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 9, 2009, I caused true copies of the foregoing INITIAL DISCLOSURES to be served by first-class U.S. mail, proper postage prepaid, and by electronic mail upon the following Counsel:

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Susan M. Freedman