

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

GOLDING FARMS FOODS, INC.,)	
)	
Opposer,)	Opposition No. 91194024
)	Serial No. 77731547
v.)	Mark: NATURAL HEALTHY
)	SPRING WATER
)	
JAQUEZ, RAYMOND d/b/a MULTI)	
VITAMIN ENERGY CORP.,)	
)	
Applicant)	
)	
)	
)	

Applicant, Raymond Jaquez d/b/a Multi-Vitamin Energy Corp., by and through counsel, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, hereby make the following disclosures:

A. The Name and Address of Individuals Known to Have Discoverable

Information that Applicant May Use to Support its Defenses and Claims:

1. One or more representatives of Applicant knowledgeable about the design, development, marketing, sales, and profitability of the Applicant's Mark and products bearing that mark.

a. Knowledgeable persons include the following: Mr. Raymond Jaquez, Mr. Victor Rios and Mr. Juan Polanco. All can be contacted as follows:

c/o Harold G. Furlow, Esq.
260 West Main Street, Suite 10
Bay Shore, New York 11706

These persons are expected to know aspects of one or more of the trademark development, trademark design, usage of the trademark and Applicant's mark in

commerce, sales, figures and product identity in the market. They further are expected to have knowledge of one or more of the packaging and sales of Applicant's products, revenue received therefrom and profits thereon, and other relevant aspects of the industry.

B. Description by category and location of all documents, data compilations 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:

1. Documents reflecting the design and development of the Applicant's Trademark design.
2. Documents reflecting sales, profitability, marketing of the product sold and marketed with the trademark.

All such documents are maintained by Applicant and can be obtained from counsel.

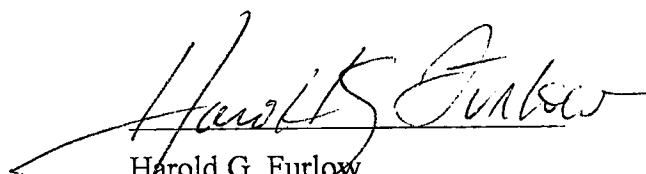
C. A computation of any category of damages claimed by the disclosing party:

Unknown at this time.

D. Insurance agreements under which any person carrying on an insurance business may be liable to satisfy part or all of the judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the payments:

No such policy exists.

This 29th day of June 2010.

A handwritten signature in cursive script, appearing to read "Harold G. Furlow", written over a horizontal line.

Harold G. Furlow
Attorney for Applicant
New York State Bar No. 4040820
USPTO Registration No. 43,621

