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

Proceeding	91196425
Party	Plaintiff Demand Media, Inc.
Correspondence Address	PAUL D MCGRADY JR GREENBERG TRAURIG LLP 77 W WACKER DRIVE , SUITE 3100 CHICAGO, IL 60601-1732 UNITED STATES chiipmail@gtlaw.com
Submission	Reply in Support of Motion
Filer's Name	Eric J. Maiers
Filer's e-mail	maierse@gtlaw.com, osheak@gtlaw.com, chiipmail@gtlaw.com
Signature	/Eric J. Maiers/
Date	03/03/2011
Attachments	Supplementation.pdf (2 pages)(61660 bytes) Exhibits.pdf (34 pages)(2636474 bytes)

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

In the Matter of Trademark Application Serial No. 77/699,474
Published August 10, 2010

DEMAND MEDIA, INC.	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91196425
	)	
GLOBAL DIGITAL LLC,	)	
	)	
Applicant.	)	

SUPPLEMENTATION IN SUPPORT OF OPPOSER'S MOTION TO COMPEL RESPONSES TO DISCOVERY REQUESTS

Opposer Demand Media, Inc. ("Demand Media") submits this brief and accompanying exhibits to supplement the record of its pending Motion to Compel Responses to Discovery Requests ("Motion"). The Motion references Exhibits A-D, but it appears from the TTABVUE records that those exhibits were inadvertently omitted when the Motion was filed on February 17, 2011. Accordingly, Demand Media hereby submits the attached Exhibits A-D in supplementation of the Motion.

Dated: March 3, 2011

Respectfully submitted,

/s/ Eric J. Maiers

Paul D. McGrady, Jr.
Kevin J. O'Shea
Eric J. Maiers
Greenberg Traurig, LLP
77 West Wacker Drive
Chicago, IL 60601
Phone: (312) 456-8400
Fax: (312) 456-8435
Attorneys for Opposer Demand Media, Inc

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing MOTION TO COMPEL RESPONSES TO DISCOVERY REQUESTS has been served via first class mail this 3rd day of March, 2011, to:

Lawrence G. Townsend
Law Offices of Lawrence G. Townsend
455 Market Street, Suite 1910
San Francisco, CA 94105

/s/ Eric J. Maiers
Eric J. Maiers

Exhibit A

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

In the Matter of Trademark Application Serial No. 77/699,474
Published August 10, 2010

DEMAND MEDIA, INC.	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91196425
	)	
GLOBAL DIGITAL LLC,	)	
	)	
Applicant.	)	

DEMAND MEDIA, INC.'S FIRST SET OF INTERROGATORIES TO APPLICANT GLOBAL DIGITAL LLC.

Opposer Demand Media, Inc. ("Demand Media"), pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure requests that Applicant Global Digital LLC ("Applicant") answer the following interrogatories within thirty days of service of this document.

These interrogatories are to be deemed continuing and to require supplemental answers if further information of the character called for by the interrogatories is developed at any time prior to trial. The interrogatories shall apply to any and/or all divisions of representatives of Applicant having knowledge of the information sought herein.

DEFINITIONS AND INSTRUCTIONS

The following interrogatories are subject to the definitions set forth below:

A. "You," "your" or "Applicant" shall refer to Global Digital LLC, Inc. and any predecessors, successors, parent corporations, subsidiaries, affiliates, segments or divisions thereof, any present or former members of its Board of Directors, and any present or former

officers, employees, agents, representatives, attorneys, accountants or other Persons acting or purporting to act on its behalf.

B. "Demand Media" shall refer to Opposer Demand Media, Inc.

C. The term "Applicant's Mark" shall mean the proposed mark "GOLFLINK NETWORK and Design" as covered by Application Serial No. 77/699474. "Applicant's Trade Dress" shall mean graphics and designs associated with Applicant's Mark, to the extent there are any, as they may appear in Applicant's advertising and promotion and on Applicant's websites.

D. The term "Opposer's Marks" shall mean "G GOLFLINK & Design" and/or "GOLFLINK."

E. "Document" shall mean any writing, record and/or electronically stored information of every type and description in the possession, custody or control of Applicant, including, without limitation, correspondence; memoranda; stenographic or handwritten notes; studies; books, charts; agreements; communications, including intra-company communications and correspondence; e-mails; cablegrams; faxes; radiograms and telegrams; summaries, minutes and records or telephone conversations, meetings and conferences; summaries and records of Personal conversations or interviews; manuals, publications and diaries; computer readable media; laboratory and engineering reports and notebooks; plans; sketches and drawings; photographs; reports and/or summaries of investigations and/or surveys, opinions and reports of consultants; opinions of counsel; reports and summaries of negotiations; brochures; pamphlets; catalogs and catalog sheets; advertisements, including story-boards, mock-ups, blueprints, layout schematics and/or scripts for television, radio, magazine commercials, trade show publications, and/or trade displays of any kind; circulars, trade letters; press or trade publicity and releases;

drafts of original or preliminary notes on and marginal comments appearing on any document; graphs; maps, pictures and voice recordings (including but not limited to video tapes, film clips and audio tapes); computer software; voicemails; podcasts; audio or video files; digital photographs; instant messages; and electronic data of any kind; shall mean a copy where the original is not in possession, custody or control of Applicant; and shall mean each copy of every document where such copy is not an identical copy of an original.

F. "Person" shall mean an individual, firm, partnership, corporation or other organization.

G. "Identify," when used in reference to a Document, requires:

(i) The nature or type of Document (e.g., letter, contract, memorandum, catalog, advertisement, package, e-mail, word processing document, spreadsheet, etc.);

(ii) A brief description of the contents of the Document;

(iii) The name, business address, job title and responsibilities of the author and of each Person who has made any notation thereon, or who has signed or initialed the Document;

(iv) The date of the Document;

(v) The name, business address, job title and responsibilities of each recipient and designated recipient of the Document or any copy thereof;

(vi) The name, business address, job title and responsibilities of any Person who now has (or is last known to have had) possession, custody, or control of the original Document; and

(vii) Whether Applicant will claim the Document as privileged or otherwise not a proper subject of discovery, and the legal or factual basis for any such claim.

H. "Identify", when used in reference to a (an):

(i) Natural Person means to state his/her full name, present or last known business address and home address, employer, business, or professional affiliations, job title, position, vocation, and associated responsibilities;

(ii) Corporation means to state its full name, date and State of its incorporation, and the address of its principal office or place of business;

(iii) Partnership, association, or other legal entity means to state the full name, date of formation and the address of its principal office or place of business; and

(iv) Act shall mean to state a description of the act; when it occurred; the identity of the Person or persons performing said act (or in the case of an omission, the identity of the Person or persons failing to act); and the identity of all Persons who have knowledge, information or belief about the act.

I. "Communicate" or "communication" includes written or oral communications. "Oral communication" includes any utterance heard by any Person, electronic device or otherwise.

INSTRUCTIONS

1. If Applicant refuses to answer an Interrogatory in whole or in part based on a claim that any privilege applies to the information sought, identify the privilege and describe the basis for Applicant's claim of privilege with sufficient specificity to allow for Demand Media and/or the Board to determine the legal sufficiency of the claim of privilege.

2. In the event Applicant objects to an Interrogatory, Applicant is requested to respond to that Interrogatory to the extent it is not objectionable and specifically identify that portion of the Interrogatory that is objectionable.

3. Each paragraph, subparagraph, and the definitions are to be construed independently, and not by or with reference to any other paragraph or subparagraph or definition if such construction would limit the scope of any particular Interrogatory.

4. If any of these Interrogatories cannot be answered in full, Applicant is to answer to the fullest extent possible, specifying the reason for Applicant's inability to answer the remainder, and stating what information, knowledge or belief Applicant has concerning the unanswered portion.

5. For the convenience of the Board and the parties, and consistent with the Board's desired practice, Applicant requests that each Interrogatory be quoted in full immediately preceding the response.

6. These Interrogatories are deemed continuing. Applicant is under a duty to supplement, correct or amend its response to any of these Interrogatories if Applicant learns that any response is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to Applicant during the discovery process or otherwise in writing.

INTERROGATORIES

INTERROGATORY NO. 1.

Describe with particularity your decision to seek federal registration of the mark of Application Serial No. 77/699474. Your answer should include Applicant's reasons for seeking federal registration of this marks, the process that Applicant followed in reaching its decision, and the identity of the person(s) who made the decision.

INTERROGATORY NO. 2.

Describe with particularity how Applicant conceived of and arrived at the selection of Applicant's Mark for the products and services listed in Application Serial No. 77/699474, including, but not limited to, any alternatives considered and the factors used or considered in selecting each of these marks.

INTERROGATORY NO. 3.

Describe with particularity how Applicant conceived of and arrived at the selection of Applicant's Trade Dress, to the extent there is any, including but not limited to, any alternatives considered and the factors used or considered in selecting Applicant's Trade Dress.

INTERROGATORY NO. 4.

Identify and describe with particularity all trademark searches, reports, studies, investigations or analyses relating, in whole or in part, to Applicant's Mark (or the products or services promoted, sold, or offered using Applicant's Mark) that were created or obtained in connection with, or in planning for, Applicant's decision to seek federal registration of Applicant's Mark, and identify the person or persons having knowledge or information relating to each such search, report, study or analysis.

INTERROGATORY NO. 5.

Identify your earliest date of use, if any, of Applicant's Mark in the United States and describe in detail the basis and facts supporting such alleged first use.

INTERROGATORY NO. 6.

Describe in detail the basis and facts supporting any and all of your alleged use of Applicant's Marks in each year from the date of first use identified in the answers to Interrogatory No. 5 above, to the present.

INTERROGATORY NO. 7.

Identify the officers and employees of Applicant having the most familiarity with Applicant's adoption and use of Applicant's Marks.

INTERROGATORY NO. 8.

Describe with particularity the first time you acquired knowledge or awareness of Demand Media's use of Opposer's Marks and the manner in which you became aware of each such use.

INTERROGATORY NO. 9.

Identify all products and services planned to be or that currently are advertised, marketed, distributed, sold, or offered by you using, bearing or displaying Applicant's Mark or another mark incorporating GOLFLINK.

INTERROGATORY NO. 10.

For each product and service described in the answers to Interrogatory No. 9, describe with particularity the channels of trade through which each such product or service has been or will be sold or distributed by you, including the class(es) of customer(s) for each such product or service, and the geographic scope for each such channel of trade.

INTERROGATORY NO. 11.

For each product and service described in the answers to Interrogatory No. 9, describe all your past, present, and anticipated efforts to promote or advertise such products and services using each of Applicant's Mark.

INTERROGATORY NO. 12.

Identify each magazine, newspaper, newsletter, trade directory, website or other publication in which Applicant has advertised or promoted, or plans to advertise or promote, Applicant's products and/or services offered under one or more of Applicant's Mark.

INTERROGATORY NO. 13.

Identify all advertising agency, public relations, website design or Internet consulting firms that are now or have ever been employed by Applicant in connection with the use, scheduled use or planned use of one or more of Applicant's Mark in connection with each of the products and services identified in Interrogatory No. 6, including, but not limited to, the identity of those persons responsible for Applicant's account with respect to the use, scheduled use or planned use of Applicant's Mark.

INTERROGATORY NO. 14.

To the extent known, please identify and explain Applicant's current plans to expand its use of each of Applicant's Mark or to use new marks incorporating the word GOLFLINK over the next 10 years. Your answer should include any and all plans to offer expanded or different products or services, expand the geographic territory of Applicant's products or services utilizing Applicant's Mark, attract new customers, or otherwise alter or change the business of Applicant in any way.

INTERROGATORY NO. 15.

Describe with particularity the type of your customers and geographic location your customers to whom you currently offer or plan to offer your products and services under Applicant's Mark.

INTERROGATORY NO. 16.

State, separately by month, quarter and year, Applicant's total sales by dollar for the services provided under Applicant's Mark in the United States since Applicant's first use Applicant's Mark in the United States..

INTERROGATORY NO. 17.

State, separately by month, quarter and year, the total advertising and promotional expenditures made in the United States by or on behalf of Applicant in connection with Applicant's Mark, also state the total advertising and promotional expenditures made in the United States by or on behalf of Applicant for the 24 months prior to the first use of Applicant's Mark.

INTERROGATORY NO. 18.

If Applicant has sought any legal advice relating to its use or registration of Applicant's Mark, including any advice relating to whether such use or registration may infringe or interfere with the rights of Demand Media or any other person, identify the date of such opinion or advice and all documents describing, discussing or referring to the legal advice.

INTERROGATORY NO. 19.

Identify the persons primarily responsible for the advertising, merchandising, marketing and sale of Applicant's products or services sold under Applicant's Mark.

INTERROGATORY NO. 20.

Identify with particularity incidents involving persons who were confused or mistaken about the source of products or services offered in connection with Demand Media's Mark or Applicant's Mark, or who were confused about the relationship between Demand Media and

Applicant or who commented on the similarity of Demand Media's Mark and any of Applicant's Mark or otherwise associated Demand Media's Mark with Applicant's Mark.

INTERROGATORY NO. 21.

Identify each person whom you may call as a fact or expert witness in this proceeding, and provide the expected subject matter of each person's testimony.

INTERROGATORY NO. 22.

Identify all documents and things Applicant expects to introduce as evidence in the present proceedings.

INTERROGATORY NO. 23.

Describe with particularity all facts that support your contention in Applicant's Answer that Demand Media's Opposition is barred by the doctrine of unclean hands.

INTERROGATORY NO. 24.

Describe with particularity all facts that support your contention in Applicant's Answer that Demand Media's claim is barred by the doctrine of estoppel and consent.

INTERROGATORY NO. 25.

Describe with particularity all facts which support your contention in Applicant's Answer that Demand Media's mark covered by U.S. Registration No. 2,44,530 has been abandoned.

INTERROGATORY NO. 26.

Describe with particularity all facts which support your contention in Applicant's Answer that Demand Media's claim is barred because of fraud on the Trademark Office arising out of, by way of example, Demand Media's filings in connection with its trademark registrations.

INTERROGATORY NO. 27.

Describe with particularity any use of any mark or trade dress by third parties that

Applicant contends is relevant.

INTERROGATORY NO. 28.

Identify all persons with knowledge of the facts in support of your answers to Interrogatory Nos. 23-27 above.

INTERROGATORY NO. 29.

Identify each and every document reflecting, referring or relating to communications between Applicant and third parties with respect to Applicant's use or registration of Applicant's Mark.

Dated: January 7, 2011

Respectfully submitted,

Paul D. McGrady, Jr.
Kevin J. O'Shea
Eric J. Maiers
Greenberg Traurig, LLP
77 West Wacker Drive
Chicago, IL 60601
Phone: (312) 456-8400
Fax: (312) 456-8435
Attorneys for Opposer Demand Media, Inc

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing FIRST SET OF INTERROGATORIES has been hand-delivered this 7th day of January, 2011, to:

Lawrence G. Townsend
Law Offices of Lawrence G. Townsend
455 Market Street, Suite 1910
San Francisco, CA 94105

Eric J. Maiers

Exhibit B

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

In the Matter of Trademark Application Serial No. 77/699,474
Published August 10, 2010

DEMAND MEDIA, INC.	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91196425
	)	
GLOBAL DIGITAL LLC,	)	
	)	
Applicant.	)	

DEMAND MEDIA, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

Opposer, Demand Media, Inc. ("Demand Media") pursuant to Rule 34 of the Federal Rules of Civil Procedure and 37 C.F.R. §§2.116 and 2.120, requests that Applicant, Global Digital LLC. ("Applicant"), produce and permit Applicant to inspect and copy within thirty (30) days, such production to be at GREENBERG TRAURIG, LLP, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601 or at any other place mutually agreeable to counsel for Demand Media and Applicant, the following designated documents and things which are in Applicant's possession, custody or control so as to enable compliance with the close of discovery, as well as any necessary depositions, discovery conferences and/or motions thereon by such date as may be mutually agreed upon by counsel or set by order of the Board.

DEFINITIONS

The definitions and instructions forming part of Demand Media's First Set of Interrogatories, served concurrently herewith, are herby incorporated by reference.

INSTRUCTIONS

For the purposes of these requests, the following instructions apply:

1. Each request is to be responded to in accordance with the Federal Rules of Civil Procedure.

2. The requests are to be regarded as continuing in nature, such that further, more complete and supplemental responses shall be timely served if you obtain further, more complete, or new information or documents prior to the final disposition of this action.

3. Each paragraph and subparagraph hereof and the definitions herein are to be construed independently, and not by or with reference to any other paragraph or subparagraph or definition herein for purposes of limiting the scope of any particular request or the subject matter thereof.

4. If any portion of any document is responsive to any document request, the entire document shall be produced.

5. If any of these document requests cannot be satisfied in full, you are to produce documents to the extent possible, specifying the reason for your inability to produce further documents, and stating what information, knowledge or belief you have concerning the unproduced portion. You then have a continuing obligation to make efforts to produce the remaining documents.

6. The documents produced in response to these requests shall be either organized and designated to correspond to the categories in the requests, or produced in a form that accurately reflects how they are maintained by you in the normal course of business, including but not limited to, the following:

a. That all associated file labels, file headings and file folders be produced together with the responsive documents from each file and that each file be identified as to its owner or custodian;

b. That all pages now stapled or fastened together be produced stapled or fastened together; and

c. That all documents which cannot be legibly copied be produced in their original form.

7. If any claim of privilege is asserted, in whole or in part, with respect to any document, or you refuse to disclose any document requested herein, in whole or in part, on any other ground, identify each such document as follows:

a. date of document;

b. description of document (i.e., letter, memorandum);

c. author of document;

d. signer of document (including entity with which such signer is affiliated);

e. recipient or addressee of document (including entity with which such recipient or addressee is affiliated);

f. the name, address and affiliation of each person to whom a copy of the document was sent or shown or explained, including "blind" copies;

g. subject matter of document;

h. number of pages;

i. attachments or appendices or enclosures;

j. nature of privilege claimed; and

k. present physical location of document.

In the event that you decline to comply with any or all of the above identification instructions on the grounds that compliance would divulge privileged information, you shall so state and set forth an explanation accordingly.

8. With respect to any document which has been destroyed, identify each document in the manner detailed in ¶7 hereof and state the date of destruction, manner of destruction, reason for destruction, person authorizing destruction and person destroying same.

9. With respect to any document which is no longer in your possession, custody or control, identify each document in the manner detailed in ¶7 hereof and indicate the present custodian of the same.

10. These document requests are intended to seek documents necessary to Plaintiffs' preparation of this case and are not meant to be harassing or burdensome in any way. If you believe that a document request is vague, ambiguous or unduly burdensome, rather than object, please contact the undersigned counsel, and every effort will be made to rephrase the document request to remove the ambiguity or minimize the burden. This rephrasing will be put in a reply letter which may be treated as a modification of the document request, provided that such modification shall not delay the time for your response to the request.

11. If, in answering these requests, you claim any ambiguity in interpreting either the request or a definition or instruction applicable thereto, such claim shall not be utilized by you as a basis for refusing to respond, but there shall be set forth as part of the response the language deemed to be ambiguous, the interpretation chosen or used in responding to the request, and the interpretation not chosen or used in responding to the request.

12. Each request herein contemplates production of the entire matter without abbreviation, expurgation or redaction.

DOCUMENT REQUESTS

REQUEST NO. 1:

Produce all documents referring or relating to Application Serial No. 77/699,474.

REQUEST NO. 2:

Produce all documents referring or relating to any names, marks, trademarks, designs, colors or trade dress considered by Applicant in addition to, or as alternatives to, those identified in Application Serial No. 77/699,474, and Applicant's Trade Dress.

REQUEST NO. 3:

Produce all trademark search reports, studies, research, or investigations relating or referring to Applicant's Mark.

REQUEST NO. 4:

Produce representative samples of all actual or intended uses of Applicant's Mark, including each different website and the like. Photographs or color copies may be produced if the production of a sample is impossible or impractical under the circumstances.

REQUEST NO. 5:

Produce all documents that refer, relate or pertain to the conception, creation or development of advertising or marketing campaigns relating to Applicant's Mark, including but not limited to any communication with any advertising agencies and the like.

REQUEST NO. 6:

Produce all business or marketing plans relating to all products and services planned to be or that currently are advertised, distributed, sold, or offered in connection with Applicant's Mark.

REQUEST NO. 7:

Produce documents sufficient to show the date of Applicant's first use and date of Applicant's first use in commerce of Applicant's Mark.

REQUEST NO. 8:

Produce all documents and things that Applicant intends to offer as exhibits during this Opposition.

REQUEST NO. 9:

Produce all documents reviewed, relied upon, or identified by Applicant in answering Demand Media's First Set of Interrogatories to Applicant, and not otherwise produced in response to a more specific request herein.

REQUEST NO. 10:

Produce all documents reviewed or relied upon by Applicant in answering Demand Media's Notice of Opposition, and not otherwise produced in response to a more specific request herein.

REQUEST NO. 11:

For each individual whom Applicant may call to testify as an expert witness, please produce the following:

a. A written report containing a complete statement of all of the expert's opinions and conclusions relevant to this cause and grounds therefor;

b. Any and all information considered by the witness in forming the expert's opinions;

c. Any exhibits to be used as summary of or in support of the expert's conclusions;

d. A current resume, curriculum vitae or other similar document listing the qualifications of the witness, including a list of all publications authored by the witness in the past ten (10) years; and

e. A list of other cases in which the witness has testified at trial or by deposition within the last four (4) years.

REQUEST NO. 12:

For each fact witness whom Applicant intends to call in this Opposition, please produce the following:

a. A resume or employment history; and

b. All documents considered or reviewed by the witness in preparing to testify in this Opposition

REQUEST NO. 13:

Produce all documents in Applicant's possession, custody, or control that refer or relate to Demand Media's use of Opposer's Marks.

REQUEST NO. 14:

Produce all documents in Applicant's possession, custody, or control that refer or relate to Demand Media.

REQUEST NO. 15:

Produce all documents relating to any study, survey, research, or investigation conducted by you, or on your behalf, relating to recognition of, or reaction to, any likelihood of confusion or association between Opposer's Marks and Applicant's Mark, on the other.

REQUEST NO. 16:

Produce all documents that refer or relate to the circumstances surrounding your initial awareness of Demand Media's use of any of Demand Media's trademarks, including Opposer's Marks.

REQUEST NO. 17:

Produce all documents and things concerning any incidents involving persons who were confused or mistaken about the source of products or services offered in connection with Opposer's Marks or Applicant's Mark, or who were confused about any association with, or relationship between Demand Media and Applicant or who associated Demand Media and Applicant due to Applicant's use of Applicant's Mark.

REQUEST NO. 18:

Produce all documents that refer or relate to Applicant's past, present, and/or future plans to expand its business over the next 10 years with respect to products or services identified in response to Demand Media's Request No. 6. Responsive documents include any and all plans or associated communications relating to expanded or different products or services, expansion of the geographic territory of Applicant's products or services, or any other alteration or change to the business of Applicant.

REQUEST NO. 19:

Produce all documents sufficient to describe any document retention policy or policies that would govern the documents requested herein, and that would identify the custodian(s) of such documents, including documents referring to Applicant's document destruction policies.

REQUEST NO. 20:

Produce all documents either identified in your responses to "Demand Media's First Set of Requests to Applicant" or containing the information referred to in your responses.

REQUEST NO. 21:

Produce all documents, data compilations, and tangible things in your possession, custody, or control that you believe tend to support or refute the allegations in your Answer to Notice of Opposition.

REQUEST NO. 22:

Produce representative samples of past and present advertisements and promotional pieces bearing Applicant's Mark.

REQUEST NO. 23:

Produce all documents referring or relating to your conception, creation, selection, and adoption of each format of Applicant's Mark, including but not limited to any documents relating to a change from any previous trade dress, design, color, name or mark.

REQUEST NO. 24:

Produce all documents referring or relating to your consideration of alternatives to Applicant's Mark or Applicant's Trade Dress.

REQUEST NO. 25:

Produce documents sufficient to show the classes, kinds, and categories of persons (e.g. wholesalers, retailers, consumers, etc.) who presently purchase or receive or who are likely to have an interest in purchasing or receiving the products and/or services identified in response to Demand Media's Request No. 6.

REQUEST NO. 26:

Produce documents sufficient to show each person or entity to whom or which Applicant directly sells, has sold or otherwise provided, or intends to sell the products and/or services identified in response to Demand Media's Request No. 6.

REQUEST NO. 27:

Produce documents sufficient to show Applicant's total sales by dollar for the services provided under Applicant's Mark in the United States and documents sufficient to show Applicant's total sales by dollar for those services or related services for the 24 months prior to the first use of said marks.

REQUEST NO. 28:

Produce all documents referring or relating to comments about the similarity of any of Applicant's Mark and Opposer's Marks or any association between Applicant's Mark and Opposer's Marks.

REQUEST NO. 29:

Produce all documents that refer, relate or pertain to the licensing of Applicant's Mark.

REQUEST NO. 30:

Produce all documents that refer, relate or pertain to the uses of any mark or trade dress by third parties that Applicant contends is relevant.

REQUEST NO. 31:

Produce all documents that refer, relate or pertain to uses by Applicant of marks or trade dress other than Applicant's Mark that are relevant.

REQUEST NO. 32:

Produce all documents that refer, relate or pertain to any reference to Applicant's Mark in any media.

REQUEST NO. 33:

Produce all documents that refer, relate or pertain to any legal opinions regarding Applicant's Mark or Opposer's Marks.

Dated: January 7, 2011

Respectfully submitted,

Paul D. McGrady, Jr.
Kevin J. O'Shea
Eric J. Maiers
Greenberg Traurig, LLP
77 West Wacker Drive
Chicago, IL 60601
Phone: (312) 456-8400
Fax: (312) 456-8435
Attorneys for Opposer Demand Media, Inc

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS has been hand-delivered this 7th day of January, 2011, to:

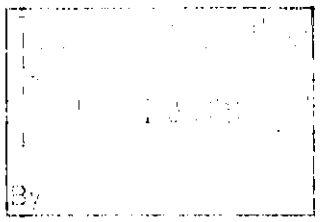
Lawrence G. Townsend
Law Offices of Lawrence G. Townsend
455 Market Street, Suite 1910
San Francisco, CA 94105

Eric J. Maiers

Exhibit C

February 6, 2011

Attn: Eric Maiers
Greenberg Traurig
77 West Wacker Drive
Suite 3100
Chicago, Illinois
60601



RE: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK & Design
Your Ref. 104128.219500

Dear Mr. Maiers,

Applicant "Global Digital LLC" responds to the discovery served on Applicant by Opposer "Demand Media Inc." on January 7, 2010 consisting of (Demand Media Inc.'s First Set Of Requests For Production Of Documents & Things and Interrogatories, copy provided herewith) - as follows:

Applicant objects to said discovery requests to the extent that any or all such requests are burdensome, overbroad, vague and ambiguous, are not reasonably calculated to lead to the discovery of admissible evidence, call for material protected by the attorney-client or work product privilege, and/or call for confidential or trade secret information. Without waiving said objections, Applicant is in the process of obtaining new counsel and will respond to the discovery in full as soon as practicable.

Mr. Townsend will confirm in writing that he did not verbally agree or infer agreement to any standard or modified protective order in relation to this case and new counsel will address this fact with your goodselves.

In the meantime, should you have any questions or concerns, please do not hesitate to contact me regarding this matter.

Sincerely,

Matt Harper
Managing Partner
Global Digital LLC
1100 Glendon Ave. 17th Floor
Los Angeles, CA.
90024

V. 805 208 6455 UTC -8
F. 310 689 7272
email: mattharper@mac.com

DOCKETED

GREENBERG TRAURIG

February 7, 2011

PROOF OF SERVICE

I hereby certify that a true copy of the Global Digital LLC response to Demand Media Inc.'s First Set Of Requests For Production Of Documents & Things and Interrogatories was delivered by United States Postal Service Express Mail today (tracking number EG 541616135 US) to Mr. Eric Maiers, Greenberg Traurig, 77 West Wacker Drive, Suite 3100, Chicago, Illinois, 60601 this 7th day of February 2011.

Matt Harper
Managing Partner
Global Digital LLC
1100 Glendon Ave. 17th Floor
Los Angeles, CA.
90024

V. 805 208 6455 UTC -8
F. 310 689 7272
email: mattharper@mac.com

Exhibit D

Maiers, Eric J. (Assoc-Chi-IP-Tech)

From: Larry Townsend [LTOWNSEND@owe.com]
Sent: Wednesday, December 22, 2010 10:59 AM
To: Maiers, Eric J. (Assoc-Chi-IP-Tech)
Subject: RE: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK and Design

Dear Eric,

I have been informed that I no longer will represent Global Digital, and therefore the telephone conference scheduled for later today is canceled. As soon as new representation is on board, I trust you will be promptly notified.

Larry

Lawrence G. Townsend
455 Market Street, 19th Floor
San Francisco, CA 94105

Tel: 415-882-3288
Fax: 415-882-3299
Email: lgt@lgt-law.com

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, please notify the above sender, and destroy all copies of this message and any attachments. Thank you.

From: maierse@gtlaw.com [mailto:maierse@gtlaw.com]
Sent: Monday, December 20, 2010 1:21 PM
To: Larry Townsend
Subject: RE: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK and Design

Sorry, Larry, I should have been more clear. I thought we were talking about your availability for Wednesday. Can we plan on 1:00 PM PST on Wednesday?

Regards,
Eric

From: Larry Townsend [mailto:LTOWNSEND@owe.com]
Sent: Monday, December 20, 2010 3:14 PM
To: Maiers, Eric J. (Assoc-Chi-IP-Tech)
Subject: RE: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK and Design

Call me anytime between now and 1:30 PST.

Larry

From: maierse@gtlaw.com [mailto:maierse@gtlaw.com]
Sent: Monday, December 20, 2010 12:59 PM
To: Larry Townsend
Cc: McGradyP@gtlaw.com; GriersonL@gtlaw.com
Subject: RE: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK and Design

Hi Larry,

Let's plan on 1:00 PM PST.

Regards,
Eric

From: Larry Townsend [mailto:LTOWNSEND@owe.com]
Sent: Monday, December 20, 2010 1:44 PM
To: Maiers, Eric J. (Assoc-Chi-IP-Tech)
Cc: McGrady, Paul D. (Shld-Chi-IP-Tech); Grierson, Loyanna (Paralegal-Chi-IP-Tech)
Subject: RE: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK and Design

Eric,

No problem. Would 1:00 or 1:30 Pacific Time work? Or another time after that.

Thanks.

Larry

From: maierse@gtlaw.com [mailto:maierse@gtlaw.com]
Sent: Monday, December 20, 2010 11:00 AM
To: Larry Townsend
Cc: McGradyP@gtlaw.com; GriersonL@gtlaw.com
Subject: RE: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK and Design

Larry,

I apologize, but I just saw your email today. As we had discussed, I added some clawback provisions at the end. I also removed some of the text of the preamble, as it related solely to the unaltered form of the standard protective order.

Can we reschedule our call for later in the day or possibly Wednesday?

Kind regards,

Eric J. Maiers
Associate
Greenberg Traurig, LLP | 77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
Tel 312.456.1036 | Fax 312.899.0383
maierse@gtlaw.com | www.gtlaw.com

From: Larry Townsend [mailto:LTOWNSEND@owe.com]
Sent: Thursday, December 16, 2010 4:58 PM

To: Maiers, Eric J. (Assoc-Chi-IP-Tech)
Cc: McGrady, Paul D. (Shld-Chi-IP-Tech); Grierson, Loyanna (Paralegal-Chi-IP-Tech)
Subject: RE: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK and Design

Dear Eric,

Can you confirm that the Protective Order is the TTAB standard form? If there are changes, kindly let me know what they are. Thanks.

Yes, I am available on Monday. Let me know if 11:00 Pacific time works for you.

Larry

Lawrence G. Townsend
455 Market Street, 19th Floor
San Francisco, CA 94105

Tel: 415-882-3288
Fax: 415-882-3299
Email: lgt@lgt-law.com

From: maierse@gtlaw.com [mailto:maierse@gtlaw.com]
Sent: Thursday, December 16, 2010 10:52 AM
To: Larry Townsend
Cc: McGradyP@gtlaw.com; GriersonL@gtlaw.com
Subject: TTAB Opp. No. 91196425 re: GOLFLINK NETWORK and Design

Dear Larry,

In furtherance of our meet and confer, please find attached our proposed Protective Order. Let us know if you approve or if you have any comments.

Additionally, we would like to speak with you about some additional matters of which you may or may not be aware. Please let us know if you are available either tomorrow morning or Monday to speak with us.

Kind regards,

Eric J. Maiers
Associate
Greenberg Traurig, LLP | 77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
Tel 312.456.1036 | Fax 312.899.0383
maierse@gtlaw.com | www.gtlaw.com

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