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

Proceeding	91215114
Party	Defendant Stillhouse Vineyards, LLC
Correspondence Address	M. Justin Griffin Virginia Small Business Law, PLLC 15 E Franklin St Richmond, VA 23219 UNITED STATES justin.griffin@vasmallbusinesslaw.com
Submission	Opposition/Response to Motion
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Date	06/10/2016
Attachments	Applicants Answer to Motion to Compel.pdf(291063 bytes )

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

SHIRLEY PLANTATION, LLC

and

UPPER SHIRLEY VINEYARDS, LLC,  
*Opposers,*

v.

STILLHOUSE VINEYARDS, LLC  
(dba PHILIP CARTER WINERY),  
*Applicant.*

Opposition No.: 91215114  
91216395

Application Nos.: 85/947562  
86/121979

Marks: Shirley Plantation  
Shirley

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**APPLICANT'S REPLY TO OPPOSERS' MOTION TO COMPEL**

On this day, June 10, 2016, Applicant has sent to Opposers supplemental response to Opposers First Request for Production of Documents and Things and First Set of Interrogatories on Applicant.

Applicant has supplied more than sufficient answers to all reasonable Opposers requests, and has properly objected to unduly burdensome requests such as Document Request No. 45 "One full and unopened case of any product (and each unique one) bearing the Shirley marks." Applicant has also provided at least 136 pages of documents in response to Opposers requests for production of documents. The information in these documents more than establish Applicant's claim to the marks in dispute.

Date: June 10, 2016

Respectfully submitted by counsel,

A handwritten signature in black ink, appearing to read "M. Justin Griffin". The signature is written in a cursive style with a horizontal line underneath it.

M. Justin Griffin, Esq.

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**CERTIFICATE OF ELECTRONIC TRANSMISSION**

The undersigned hereby certifies that on this 10<sup>th</sup> day of June 2016, the foregoing motions were deposited with the United States Patent and Trademark Office, Trademark Trial and Appeal Board via electronic filing through their website at <http://esta.uspto.gov>.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 10<sup>th</sup> day of June 2016, the foregoing motions were served upon Opposers by delivering a true and correct copy of the same to counsel for Opposers electronically and via first class mail, as follows:

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mwv@mccarthylebit.com

Date: June 10, 2016



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M. Justin Griffin, Esq.

*Attorney for Applicant*