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

Proceeding	91217436
Party	Plaintiff Google Inc.
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Submission	Reply in Support of Motion
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Date	03/29/2017
Attachments	Opposition No. 91217436.pdf(47638 bytes)

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

GOOGLE INC.,)	
)	
)	Opposition No. 91217436 (parent)
Opposer,)	Opposition No. 91217437
)	
v.)	Application Ser. Nos. 85/674,799
)	and 85/674,801
HANGINOUT, INC.)	
)	
Applicant.)	
)	

**REPLY IN SUPPORT OF
MOTION FOR SANCTIONS
OR, IN THE ALTERNATIVE, TO COMPEL DISCOVERY**

Applicant has responded to Opposer’s motion with still more promises that it will produce its witnesses for deposition. But Opposer has, *since* Applicant’s Response was filed, proposed several dates for the deposition(s), and Applicant has indicated that either the witnesses, or counsel, are not available for any of them. Opposer agreed to a motion to extend the discovery period in order to accommodate Applicant’s busy schedule, but has heard nothing from Opposer since then.

Applicant’s Response raises no arguments that have not already been refuted. Opposer’s good faith efforts to resolve this dispute have been thoroughly documented, patiently repeated, and utterly fruitless. Applicant’s production of deposition transcripts from a prior litigation, which did not involve Applicant’s fraud upon the Trademark Office, is simply irrelevant.

Opposer respectfully reiterates its request that the Board enter judgment against Applicant for its *de facto* refusal to produce its witness(es) or, in the alternative, enter an order compelling production of those witnesses forthwith.

Dated: March 29, 2017

DICKINSON WRIGHT PLLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 29, 2017, a true copy of this document was served on counsel for the Applicant by delivering the same via First Class U.S. Mail, postage prepaid, to:

Matthew A. Becker, THE LAW OFFICE OF MATTHEW A. BECKER, PC,
1003 Isabella Avenue, Coronado, California 92118.

Dated: March 29, 2017

DICKINSON WRIGHT PLLC


Florinda Mazmanian