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

Proceeding	91231756
Party	Plaintiff SoundScape, Inc.
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Date	10/03/2017
Attachments	Pretrial Disclosures.pdf(223173 bytes)

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

SOUNDSCAPE, INC.,

Opposer,

v.

**Opposition No. 91231756
Application No. 86858352**

**BEIJING XIAONIAO TINGTING
TECHNOLOGY CO., LTD.**

Applicant.

OPPOSER'S PRETRIAL DISCLOSURES

Opposer, SOUNDSCAPE, INC. by and through their undersigned attorneys and in accordance with Federal Rule of Civil Procedure 26(a)(3)(A)(i), 37 C.F.R. §2.121(e) and TBMP §702.01 hereby serves its Pretrial Disclosures, which include its list of witnesses it may call during its Testimony Period.

1. **Martin Collins**, Owner of Opposer. Address: Beusse Wolter Sanks & Maire, PLLC, 390 N. Orange Ave., Suite 2500, Orlando, Florida 32801. Mr. Collins will testify to Soundscape, Inc.'s ownership and validity of its SOUNDSCAPE mark along with information pertaining to the goods and services being offered under the mark, the trade channels, advertising mediums and the likelihood of confusion between SOUNDSCAPE and SOUNDSPACE LINK. The type of documents to be introduced during the deposition testimony would include, but is not limited to, Opposer's Trademark Registration, proof of Opposer's use of its mark, examples of advertising, sales figures and advertising figures pertaining to the SOUNDSPACE mark.

2. **Susan Collins**, Owner of Opposer. Address: Beusse Wolter Sanks & Maire, PLLC, 390 N. Orange Ave., Suite 2500, Orlando, Florida 32801. Mrs. Collins will testify to Soundscape, Inc.'s ownership and validity of its SOUNDSCAPE mark along with information

pertaining to the goods and services being offered under the mark, the trade channels, advertising mediums and the likelihood of confusion between SOUNDSCAPE and SOUNDSPACE LINK. The type of documents to be introduced during the deposition testimony would include, but is not limited to, Opposer's Trademark Registration, proof of Opposer's use of its mark, examples of advertising, sales figures and advertising figures pertaining to the SOUNDSPACE mark.

3. **Corporate Representative for Beijing Ziaoniao Tingting Technology Co., LTD.** Address: Venable, LLP, P.O. Box 34385, Washington, DC 20043-4385. The Corporate Representative for Applicant will be asked questions pertaining to Applicant's uses and intended uses of the SOUNDSPACE LINK mark, questions pertaining to Applicant's Answer, Answers to Interrogatories, documents submitted in response to Opposer's Request for Production of Documents and any other areas of inquiry identified in Opposer's Schedule A attached to the Notice of Deposition. The type of documents to be introduced during the deposition testimony would include, but is not limited to, Applicant's trademark application, Applicant's advertising, licensees or affiliates advertising under the SOUNDSPACE LINK mark, Applicant's Answer, Applicant's Answers to Interrogatories and all documents produced by Applicant.

Dated this 3rd day of October, 2017.

Respectfully Submitted,

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By: /s/ Amber N. Davis
Amber N. Davis
Florida Bar No.: 0026628

Kevin W. Wimberly
Florida Bar No.: 0057977

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed via U.S. Mail and Electronic mail this 3rd day of October, 2017 to: Rebecca Liebotwitz, VENABLE, P.O. Box 34385, Washington, D.C. 20043-4385.

/s/ Amber N. Davis
Attorney