

ESTTA Tracking number: **ESTTA953240**

Filing date: **02/11/2019**

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

Proceeding	91237366
Party	Plaintiff Sjoklaedagerdin hf
Correspondence Address	MICHELE S KATZ ADVITAM IP LLC 150 S WACKER DRIVE, SUITE 2400 CHICAGO, IL 60606 UNITED STATES mskdocket@advitamip.com, atokarz@advitamip.com, mkatz@advitamip.com 312-332-7710
Submission	Plaintiff's Notice of Reliance
Filer's Name	Michele S. Katz
Filer's email	mkatz@advitamip.com, atokarz@advitamip.com
Signature	/Michele S. Katz/
Date	02/11/2019
Attachments	2019.02.11 Notice of Reliance.pdf(107176 bytes) Exhibit 01.pdf(328821 bytes) Exhibit 02.pdf(91936 bytes) Exhibit 03.pdf(91085 bytes) Exhibit 04.pdf(75436 bytes) Exhibit 05.pdf(73079 bytes) Exhibit 06.pdf(102788 bytes) Exhibit 07.pdf(64654 bytes) Exhibit 08.pdf(40956 bytes) Exhibit 09.pdf(183471 bytes) Exhibit 10.pdf(114336 bytes) Exhibit 11.pdf(134607 bytes) Exhibit 12.pdf(49665 bytes) Exhibit 13.pdf(38670 bytes) Exhibit 14.pdf(43903 bytes) Exhibit 15.pdf(59921 bytes) Exhibit 16.pdf(42869 bytes) Exhibit 17.pdf(55751 bytes) Exhibit 18.pdf(178446 bytes) Exhibit 19.pdf(131400 bytes) Exhibit 20.pdf(166070 bytes) Exhibit 21.pdf(53255 bytes) Exhibit 22.pdf(50891 bytes) Exhibit 23.pdf(40090 bytes) Exhibit 24.pdf(2685573 bytes) Exhibit 25 - CONFIDENTIAL - FILED UNDER SEAL.pdf(5921 bytes)

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91,237,366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

NOTICE OF RELIANCE UNDER TRADEMARK RULE 1.22(e)

Opposer, Sjoklaedagerdin, HF hereby relies upon the attached exhibits for use as evidence in the above identified proceeding.

Respectfully submitted,

Dated: February 11, 2019

/s/ Michele S. Katz

Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the **OPPOSER'S NOTICE OF RELIANCE** was served by email upon:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: February 11, 2019

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

NOTICE OF RELIANCE

EXHIBIT NO.	DOCUMENT	REGISTRATION DATE	REGISTRATION NO.	RELEVANCE
1.	Opposer's Registration for 66°NORTH	January 4, 2005	2,915,717	Status & Title
2.	Opposer's Registration for 66°NORTH	November 08, 2016	5,075,756	Status & Title
3.	Opposer's Registration for 66°N	November 08, 2016	5,075,773	Status & Title
4.	Opposer's Registration for 66°NORTH	November 22, 2016	5,084,208	Status & Title
5.	Opposer's Registration for 66°NORTH	November 29, 2016	5,088,873	Status & Title
6.	Opposer's Registration for 66°NORTH ICELAND	November 29, 2016	5,088,874	Status & Title

EXHIBIT NO.	DOCUMENT	DATE	RELEVANCE
7.	Opposer's Cease and Desist Letter to Applicant	September 28, 2017	Priority, Likelihood of Confusion, and Dilution
8.	Opposer's Initial Disclosures (Opp. No. 91,237,366)	March 12, 2018	Priority, Likelihood of Confusion, and Dilution
9.	Applicant's First Set of Interrogatories (Opp. No. 91,237,366)	April 10, 2018	Priority and Likelihood of Confusion
10.	Applicant's First Set of Requests for Admissions (Opp. No. 91,237,366)	April 10, 2018	Priority and Likelihood of Confusion
11.	Applicant's First Request for Production of Documents and Things (Opp. No. 91,237,366)	April 10, 2018	Priority and Likelihood of Confusion
12.	Opposer's Responses to Applicant's First Set of Interrogatories (Opp. No. 91,237,366)	May 10, 2018	Priority and Likelihood of Confusion
13.	Opposer's Responses to Applicant's	May 10, 2018	Priority and

	First Set of Requests for Admissions (Opp. No. 91,237,366)		Likelihood of Confusion
14.	Opposer's Responses to Applicant's First Request for Production of Document and Things (Opp. No. 91,237,366)	May 10, 2018	Priority and Likelihood of Confusion
15.	Opposer's First Set of Interrogatories to Applicant (Opp. No. 91,237,366)	May 17, 2018	Priority and Likelihood of Confusion
16.	Opposer's First Set of Requests for Admissions to Applicant (Opp. No. 91,237,366)	May 17, 2018	Priority and Likelihood of Confusion
17.	Opposer's First Request for Production of Documents to Applicant (Opp. No. 91,237,366)	May 17, 2018	Priority and Likelihood of Confusion
18.	Applicant's Responses to Opposer's First Set of Interrogatories (Opp. No. 91,237,366)	May 29, 2018	Priority and Likelihood of Confusion
19.	Applicant's Responses to Opposer's First Set of Requests for Admissions (Opp. No. 91,237,366)	May 29, 2018	Priority and Likelihood of Confusion
20.	Applicant's Responses to Opposer's First Request for Production of Document (Opp. No. 91,237,366)	May 29, 2018	Priority and Likelihood of Confusion
21.	Opposer's Supplemental Responses to Applicant's First Set of Interrogatories (Opp. No. 91,237,366)	August 13, 2018	Priority and Likelihood of Confusion
22.	Opposer's Supplemental Responses to Applicant's First Set of Requests for Admissions (Opp. No. 91,237,366)	August 13, 2018	Priority and Likelihood of Confusion
23.	Opposer's Supplemental Responses to Applicant's First Request for Production of Document and Things (Opp. No. 91,237,366)	August 13, 2018	Priority and Likelihood of Confusion
24.	Other Disclosures Regarding Channels of Trade for 66° NORTH and NORTH 61 Products	August 13, 2018	Likelihood of Confusion
25.	Confidential Affidavit of Fannar Páll Aðalsteinsson with Exhibits – FILED UNDER SEAL	August 13, 2018 & January 30, 2019	Likelihood of Confusion and Dilution

EXHIBIT 1

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 2,915,717

Registered Jan. 4, 2005

**TRADEMARK
PRINCIPAL REGISTER**



SJOKLAEDAGERDIN HF. (ICELAND CORPORATION)
MIDHRAUNI 11
GARDABAER, ICELAND 210

FIRST USE 1-1-2003; IN COMMERCE 1-1-2003.

OWNER OF U.S. REG. NO. 1,390,812.

FOR: CLOTHING AND OUTDOOR CLOTHING,
NAMELY T-SHIRTS, SHIRTS, TROUSERS, JACK-
ETS, HEADWEAR AND FOOTWEAR, IN CLASS 25
(U.S. CLS. 22 AND 39).

SER. NO. 76-537,147, FILED 8-13-2003.

MICHAEL BAIRD, EXAMINING ATTORNEY

EXHIBIT 2

United States of America

United States Patent and Trademark Office



Reg. No. 5,075,756

Registered Nov. 08, 2016

**Int. Cl.: 9, 18, 20, 25, 28,
35**

Service Mark

Trademark

Principal Register

Sjoklaedagerdin hf. (ICELAND LIMITED LIABILITY COMPANY)
Midhrauni 11
IS-210 Gardabae
ICELAND

CLASS 9: Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury

CLASS 18: Bags, namely, spoiling bags in the nature of all-purpose carrying bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belts, hydration packs, namely, backpacks compatible with personal hydration systems sold empty, compressor bags, namely, bags which compress horizontally or vertically via attached straps, shoulder bags, messenger bags, book bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags, boston bags, backpacks with internal and external frames, backpack bottle pockets, rain covers designed for use with backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats

CLASS 20: Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses

CLASS 25: Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets; jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; athletic tops and bottoms for gymnastics; one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding; sandals; headgear, namely, caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts



Michelle K. Lee

Director of the United States
Patent and Trademark Office

CLASS 28: Snowshoes

CLASS 35: Advertising; business management; business administration; office functions; wholesale and retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order catalogue services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods excluding the transport thereof consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coders, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device

The color(s) red, white and blue is/are claimed as a feature of the mark.

The mark consists of the wording "66°" in white on a red square background; beneath this is the wording "NORTH" in a smaller blue font on a white rectangular background.

PRIORITY DATE OF 11-28-2014 IS CLAIMED

OWNER OF INTERNATIONAL REGISTRATION 1280645 DATED 05-28-2015,
EXPIRES 05-28-2025

SER. NO. 79-179,325, FILED 05-28-2015
AISHA CLARKE JOHNSON, EXAMINING ATTORNEY

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

EXHIBIT 3

United States of America

United States Patent and Trademark Office

66°N

Reg. No. 5,075,773

Sjoklaedagerdin hf. (ICELAND LIMITED LIABILITY COMPANY)
Midhrauni 11
IS-210 Gardabae
ICELAND

Registered Nov. 08, 2016

**Int. Cl.: 6, 8, 9, 18, 20, 21,
22, 24, 25, 28, 35, 41**

CLASS 6: Crampons being climbing irons

CLASS 8: Ice picks; pocket knives

Service Mark

CLASS 9: Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury

Trademark

Principal Register

CLASS 18: Bags, namely, all-purpose sporting bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belt bags, hydration packs, namely backpacks compatible with personal hydration systems sold empty, compressor traveling bags in the nature of bags which compress horizontally or vertically via attached straps, shoulder bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags in the nature of rucksacks for mountaineers, Boston bags, backpacks with internal and external frames, backpack bottle pockets, fitted protective rain covers used to cover backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats

CLASS 20: Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses

CLASS 21: Drinking flasks; hip flasks; insulating flasks; drinking flasks for travellers

CLASS 22: Tents; tent accessories, namely, tent storage bags, rain flies; vinyl ground cloths, tent poles sold as integral components of tents, tent pole storage sacks sold as an integral component of and being a feature of tent storage bags, and gear loft platforms used for storage, specially adapted for tents comprising of a mesh cloth or net that ties to loops suspended from the top of a tent used for storage

CLASS 24: Mattress covers for travels; sleeping bag liners; microfiber towels for travel; face towels of textile for travels; travelling rugs

CLASS 25: Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts,



Michelle K. Lee

Director of the United States
Patent and Trademark Office

trousers, vests, parkas, pullovers, anoraks, coats, jackets, jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; tops and bottoms for gymnastics, one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats, waterproof clothing in the nature of waterproof tops and bottoms; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding, sandals; headgear, namely caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts

CLASS 28: Snowshoes; skis; ski bindings; ski poles; bags adapted for skis; fitted protective covers specially adapted for skis; snowboards; bindings for snowboards; zip line apparatus for recreational purposes

CLASS 35: Advertising; business management; business administration; office functions; wholesale and retail store services relating to clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order services, catalogue ordering services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods, excluding the transport thereof, such goods consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets, enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device

CLASS 41: Education services, namely, providing classes, lectures, seminars, and workshops in the fields of camping, outdoor activities and sporting activities; providing of training services in the fields of camping, outdoor activities and sporting activities; organizing sporting and cultural events; providing training services and educational services in the nature of providing classes in the fields of sporting activities, and camping and outdoor activities, and in the use of outdoor gear and equipment; arranging seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

PRIORITY DATE OF 11-28-2014 IS CLAIMED

OWNER OF INTERNATIONAL REGISTRATION 1282413 DATED 05-28-2015, EXPIRES 05-28-2025

SER. NO. 79-180,159, FILED 05-28-2015

CHAU CRISTIA H SCHWAB, EXAMINING ATTORNEY

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

EXHIBIT 4

United States of America

United States Patent and Trademark Office



Reg. No. 5,084,208

Registered Nov. 22, 2016

**Int. Cl.: 9, 18, 20, 25, 28,
35**

Service Mark

Trademark

Principal Register

Sjoklaedagerdin hf. (ICELAND LIMITED LIABILITY COMPANY)
Midhrauni 11
IS-210 Gardabae
ICELAND

CLASS 9: Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury

CLASS 18: Bags, namely spoiling bags in the nature of all-purpose carrying bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belts, hydration packs, namely backpacks compatible with personal hydration systems sold empty, compressor bags, namely bags which compress horizontally or vertically via attached straps, shoulder bags, messenger bags, book bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags, boston bags, backpacks with internal and external frames, backpack bottle pockets, rain covers designed for use with backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats

CLASS 20: Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses

CLASS 25: Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets; jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; athletic tops and bottoms for gymnastics; one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding; sandals; headgear, namely, caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts



Michelle K. Lee

Director of the United States
Patent and Trademark Office

CLASS 28: Snowshoes

CLASS 35: Advertising; business management; business administration; office functions; wholesale and retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order catalogue services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods excluding the transport thereof consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coders, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device

The mark consists of the stylized wording "66" in a box over the stylized wording "NORTH".

PRIORITY DATE OF 11-28-2014 IS CLAIMED

OWNER OF INTERNATIONAL REGISTRATION 1278650 DATED 05-28-2015,
EXPIRES 05-28-2025

SER. NO. 79-178,485, FILED 05-28-2015
CIMMERIAN COLEMAN, EXAMINING ATTORNEY

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

EXHIBIT 5

United States of America

United States Patent and Trademark Office

66°NORTH

Reg. No. 5,088,873

Sjoklaedagerdin hf. (ICELAND LIMITED LIABILITY COMPANY)
Midhrauni 11

Registered Nov. 29, 2016

IS-210 Gardabae
ICELAND

**Int. Cl.: 6, 8, 9, 18, 20, 21,
22, 24, 25, 28, 35, 41**

CLASS 6: Crampons being climbing irons

CLASS 8: Ice picks; pocket knives

Service Mark

CLASS 9: Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury

Trademark

Principal Register

CLASS 18: Bags, namely, all-purpose sporting bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belt bags, hydration packs, namely, backpacks compatible with personal hydration systems sold empty, compressor traveling bags in the nature of bags which compress horizontally or vertically via attached straps, shoulder bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags in the nature of rucksacks for mountaineers, Boston bags, backpacks with internal and external frames, backpack bottle pockets, fitted protective rain covers used to cover backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats

CLASS 20: Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses

CLASS 21: Drinking flasks; hip flasks; insulating flasks; drinking flasks for travellers

CLASS 22: Tents; tent accessories, namely, tent storage bags, rain flies; vinyl ground cloths, tent poles sold as integral components of tents, tent pole storage sacks sold as an integral component of and being a feature of tent storage bags, and gear loft platforms used for storage, specially adapted for tents comprising of a mesh cloth or net that ties to loops suspended from the top of a tent used for storage

CLASS 24: Mattress covers for travels; sleeping bag liners; microfiber towels for travel; face towels of textile for travels; travelling rugs

CLASS 25: Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets, jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; tops and bottoms for gymnastics, one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits;



Michelle K. Lee

Director of the United States
Patent and Trademark Office

rainwear, raincoats, waterproof clothing in the nature of waterproof tops and bottoms; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding, sandals; headgear, namely, caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts

CLASS 28: Snowshoes; skis; ski bindings; ski poles; bags adapted for skis; fitted protective covers specially adapted for skis; snowboards; bindings for snowboards; zip line apparatus for recreational purposes

CLASS 35: Advertising; business management; business administration; office functions; wholesale and retail store services relating to clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order services, catalogue ordering services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods, excluding the transport thereof, such goods consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets, enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device

CLASS 41: Education services, namely, providing classes, lectures, seminars, and workshops in the fields of camping, outdoor activities and sporting activities; providing of training services in the fields of camping, outdoor activities and sporting activities; organizing sporting and cultural events; providing training services and educational services in the nature of providing classes in the fields of sporting activities, and camping and outdoor activities, and in the use of outdoor gear and equipment; arranging seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

PRIORITY DATE OF 11-28-2014 IS CLAIMED

OWNER OF INTERNATIONAL REGISTRATION 1281054 DATED 05-28-2015, EXPIRES 05-28-2025

SER. NO. 79-179,566, FILED 05-28-2015

CHAU CRISTIA H SCHWAB, EXAMINING ATTORNEY

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

EXHIBIT 6

United States of America

United States Patent and Trademark Office



Reg. No. 5,088,874

Registered Nov. 29, 2016

Int. Cl.: 18, 25, 28, 35

Service Mark

Trademark

Principal Register

Sjoklaedagerdin hf. (ICELAND LIMITED LIABILITY COMPANY)
Midhrauni 11
IS-210 Gardabae
ICELAND

CLASS 18: Bags, namely, all-purpose sporting bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belt bags, hydration packs, namely, backpacks compatible with personal hydration systems sold empty, compressor traveling bags in the nature of bags which compress horizontally or vertically via attached straps, shoulder bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags in the nature of rucksacks for mountaineers, Boston bags, backpacks with internal and external frames, backpack bottle pockets, fitted protective rain covers used to cover backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats

CLASS 25: Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets, jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; tops and bottoms for gymnastics, one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats, waterproof clothing in the nature of waterproof tops and bottoms; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding, sandals; headgear, namely, caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts

CLASS 28: Snowshoes

CLASS 35: Advertising; business management; business administration; office functions; wholesale and retail store services relating to clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order services, catalogue ordering services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of



Michelle K. Lee

Director of the United States
Patent and Trademark Office

others, of a variety of goods, excluding the transport thereof, such goods consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets, enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device

The color(s) red, blue, and white is/are claimed as a feature of the mark.

The mark consists of the wording "66°" in white stylized font within a red square. To the right is the stylized wording "NORTH ICELAND" in the color blue, with the word "NORTH" stacked above the word "ICELAND". All other white in the mark represents background or transparent areas only and is not claimed as a feature of the mark.

PRIORITY DATE OF 11-28-2014 IS CLAIMED

OWNER OF INTERNATIONAL REGISTRATION 1281055 DATED 05-28-2015,
EXPIRES 05-28-2025

No claim is made to the exclusive right to use the following apart from the mark as shown:
"ICELAND"

SER. NO. 79-179,567, FILED 05-28-2015
CHAU CRISTIA H SCHWAB, EXAMINING ATTORNEY

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

EXHIBIT 7

September 28, 2017

Via Email Patrick@burns-law.mn

Mr. Patrick R. Burns
Burns Law Firm
1624 Harmon Place, Suite 300
Minneapolis, MN 55403

Re: Withdrawal of United States Application Nos. 87358942 and 87494448 for the Mark NORTH 61 and NORTH 61 DESIGN

Dear Mr. Burns:

Please be advised that Sjoklaedagerdin hf. is the owner of the mark 66°NORTH, a mark that is the subject of United States Patent and Trademark Office Registration Nos. 2915717, 4865010, 5075773. The 66°NORTH federal registrations cover the following goods and services:

Clothing and outdoor clothing, namely, T-shirts, shirts, trousers, jackets, and headwear; clothing, namely, t-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, pullovers, sweaters, coveralls, jumpers, underwear, jerseys, children's bottoms and tops, dresses, athletic tops and bottoms for gymnastics, leggings, pajamas, skirts, uniforms, socks, stockings, tights, belts; footwear; headgear, namely, caps, hats, headbands, scarves, bandanas, balaclavas, visors, earmuffs, skullcaps; outerwear, namely, gloves, gaiters, gaiter straps, mittens, parkas, anoraks, coats, jackets, jacket hoods, shell jackets, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits, rainwear, ponchos; Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets, jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; tops and bottoms for gymnastics, one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats, waterproof clothing in the nature of waterproof tops and bottoms; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding, sandals; headgear, namely caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts; all in International Class 25.

Crampons being climbing irons, International Class 6.

Ice picks; pocket knives, International Class 8.

Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury, International Class 9.

Bags, namely, all-purpose sporting bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belt bags,



hydration packs, namely backpacks compatible with personal hydration systems sold empty, compressor traveling bags in the nature of bags which compress horizontally or vertically via attached straps, shoulder bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags in the nature of rucksacks for mountaineers, Boston bags, backpacks with internal and external frames, backpack bottle pockets, fitted protective rain covers used to cover backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats, International Class 18.

Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses, International Class 20.

Drinking flasks; hip flasks; insulating flasks; drinking flasks for travelers, International Class 21. Tents; tent accessories, namely, tent storage bags, rain flies; vinyl ground cloths, tent poles sold as integral components of tents, tent pole storage sacks sold as an integral component of and being a feature of tent storage bags, and gear loft platforms used for storage, specially adapted for tents comprising of a mesh cloth or net that ties to loops suspended from the top of a tent used for storage, International Class 22.

Mattress covers for travels; sleeping bag liners; microfiber towels for travel; face towels of textile for travels; travelling rugs, International Class 24.

Snowshoes; skis; ski bindings; ski poles; bags adapted for skis; fitted protective covers specially adapted for skis; snowboards; bindings for snowboards; zip line apparatus for recreational purposes, International Class 28.

Advertising; business management; business administration; office functions; wholesale and retail store services relating to clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order services, catalogue ordering services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods, excluding the transport thereof, such goods consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets, enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device,



International Class 35.

Education services, namely, providing classes, lectures, seminars, and workshops in the fields of camping, outdoor activities and sporting activities; providing of training services in the fields of camping, outdoor activities and sporting activities; organizing sporting and cultural events; providing training services and educational services in the nature of providing classes in the fields of sporting activities, and camping and outdoor activities, and in the use of outdoor gear and equipment; arranging seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking, International Class 41.

The 66°NORTH mark is an intellectual property asset of great value to Sjoklaedagerdin hf. However, Sjoklaedagerdin hf. believes that registration of the NORTH 61 application is likely to damage their 66°NORTH trademark rights. In this regard, Sjoklaedagerdin hf. has prior rights in 66°NORTH for the categories described herein over the rights that you have acquired, if any, in the mark NORTH 61 for the categories described in your applications at issue. Further, our client does not want your manner of use of the NORTH 61 mark, in conjunction with your products and in your advertising, to imply any sponsorship or endorsement in relation to our client where there is none.

The NORTH 61 mark should not be used in any way, including registration, that will likely confuse the public. So that we can attempt to move to an amicable resolution of this matter, please immediately cease and desist any further use of NORTH 61 and withdraw your applications.

Further, within five (5) business days of your receipt of this letter, please provide us with written confirmation that you will comply with our client's demands, and assure us that you will refrain from using the mark NORTH 61 in the future and will expressly abandon your NORTH 61 applications.

If we do not receive your confirmation by the above date, Sjoklaedagerdin hf. will have no choice but to consider filing an opposition proceeding and addressing this matter through the United States Patent and Trademark Office via the Trademark Trial and Appeal Board. Although, in anticipation of being able to resolve this matter quickly and efficiently, we note that the link to the United States Patent and Trademark Office at which point you are able to voluntarily withdraw your applications is this: <https://teas.uspto.gov/rea/>.

Very truly yours,

/s/ Michele S. Katz

EXHIBIT 8

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

OPPOSER’S INITIAL DISCLOSURES

Opposer, Sjoklaedagerdin, hf pursuant to Rule 26(a)(1)(A)(i-ii) of the Federal Rules of Civil Procedure and Trademark Rule 2.120, submits its initial disclosures as follows:

GENERAL QUALIFICATIONS

This disclosure is based on information currently and reasonably known to Opposer and its counsel and should not be taken as a representation or admission concerning the knowledge or competence of any individual identified herein or as to the relevance of any documents identified herein or that other information within the scope of Trademark Rule 2.120 does not exist. Investigation is ongoing and Opposer reserves the right to supplement and/or amend this initial disclosure and to produce subsequent discovery or other information relevant to this case.

A. **Fed. R. Civ. P.26(a)(1)(A)(i)**

Subject to and without waiving the General Qualifications, Opposer identifies the following currently known individuals who are likely to have discoverable information that may be used to support their claims or defenses, exclusive of information used solely for impeachment:

1. (a) Bjarney Hardardottir
- (b) Fannar Pall Aoalsteinsson
- (c) Hermann Sigursteinsson
- (d) Rosa Tryggvadottir

The aforementioned individuals are likely to have knowledge relating to the marketing and promotion of the marks 66°NORTH (Reg. No. 2915717), 66°NORTH (Reg. No. 5075756), 66°N (Reg. No. 5075773), 66°NORTH (Reg. No. 5084208), 66°NORTH (Reg. No. 5088873), 66°NORTH ICELAND (Reg. No. 508874) (hereinafter collectively the “66°NORTH marks”) the products offered thereunder, factors affecting the issues of trademark priority and likelihood of confusion between the parties’ marks asserted in the Notice of Opposition and the prosecution of applications for registration and/or registration of the 66°NORTH marks.

2. Other personnel: Other personnel of Opposer or related entities may have relevant discoverable information and Opposer reserves the right to supplement these Initial Disclosures with the identities of such individuals as appropriate.

3. Other witnesses: Other individuals may have relevant discoverable information, such as employees of Applicant or third parties. Opposer reserves the right to supplement these Initial Disclosures with the identities of such and other witnesses identified through the course of discovery.

Opposer anticipates that discovery may reveal additional individuals having discoverable information that supports its claims and defenses and, therefore, reserves the right to supplement its initial disclosures in accordance with Fed. R. Civ. P. 26(e).

B. **Fed. R. Civ. P. 26(a)(1)(A)(ii)**

Subject to and without waiving the General Qualifications, the following is a description by category and location of all documents, data compilations, and tangible items that are in the possession, custody, or control of Opposer that it may use to support its claims or defenses, exclusive of such materials used solely for impeachment:

1. Documents relating to the applications for registration and/or registrations for the 66°NORTH marks are located at the offices of Opposer at the address set forth in the Notice of Opposition in Gardabaer, Iceland and the offices of Tego IP, Sidumuli 13, 108 Reykjavik, Iceland.
2. Documents relating to the selection, adoption, first use and first use in commerce of the 66°NORTH marks are located at the offices of Opposer at the address set forth in the Notice of Opposition in Gardabaer, Iceland and the offices of Tego IP, Sidumuli 13, 108 Reykjavik, Iceland.
3. Documents relating to the type, nature and quality of the goods for which the 66°NORTH marks have been used are located at the offices of Opposer at the address set forth in the Notice of Opposition in Gardabaer, Iceland and the offices of Tego IP, Sidumuli 13, 108 Reykjavik, Iceland.
4. Documents relating to the sales, distribution, marketing, and advertising of goods under the 66°NORTH marks are located at the offices of Opposer at the address set forth in the Notice of Opposition in Gardabaer, Iceland and the offices of Tego IP, Sidumuli 13, 108 Reykjavik, Iceland.
5. Documents relating to the factors affecting the issues of trademark priority and likelihood of confusion between Opposer's use, applications to register and/or

registrations of the 66°NORTH marks and Applicant's designation NORTH 61 as set forth in Application Serial No. 87/358,942 are located at the offices of Opposer at the address set forth in the Notice of Opposition in Gardabaer, Iceland and the office of Tego IP, Sidumuli 13, 108 Reykjavik, Iceland.

Petitioner reserves the right to supplement this list of the category of documents in accordance with Fed. R. Civ. P. 26(e).

Respectfully submitted,

Dated: March 12, 2018

/s/ Michele S. Katz

Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **OPPOSER'S INITIAL**

DISCLOSURES is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: March 12, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 9

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

_____)		
NORTH 61 LLC)	Opposition No.	91237366
)		
Applicant,)	Mark:	NORTH 61
)		
v.)	App. No.:	87/358942
)		
SJOKLAEDAGERDIN HF)	Filing Date:	March 5, 2017
)		
Opposer.)		
_____)		

APPLICANT’S FIRST SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, Applicant hereby serves Applicant's First Set of Interrogatories and requests that Opposer respond to the Interrogatories under oath within the time provided by the Federal Rules of Civil Procedure and Trademark Rules of Practice.

DEFINITIONS AND INSTRUCTIONS

The following Definitions and Instructions shall apply to these Interrogatories:

(1) “Opposer” means the Opposer, Sjoklaedagerdin hf, its predecessors in interest, successors in interest, licensees, parents, subsidiaries, divisions and related organizations and their officers, directors, employees, agents, representatives, and all other Persons acting or purporting to act on their behalf, as the context hereof may require.

(2) “Applicant” means, the Applicant, North 61 LLC, its predecessors in interest, its successors in interest, licensees, parents, subsidiaries, divisions and related organizations and their officers, directors, employees, agents, representatives, and all other Persons acting or purporting to act on its behalf, as the context hereof may require.

(3) “Person” means any individual, sole proprietorship, partnership, firm, corporation, joint venture, association, or other entity.

(4) “Document” means any medium in the possession, custody, or control of Opposer upon which intelligence or information is recorded or from which intelligence or information can be obtained, including by way of illustration, but not by way of limitation, the following items: Letters, reports, communications, including internal company communications; preliminary notes and drafts; telegrams; telexes; faxes; memoranda; summaries of records of telephone conversations; routing (or buck) slips; magnetic media from which audible or visual information can be obtained, such as tapes, discs, or the like; diaries; graphs; notebooks; charts; plans; artists’ drawings; positive or negative prints of photographic pictures, motion or still, including excised frames of motion pictures; minutes of records of conferences and meetings, including meetings of directors, executive committees and financial committees; lists of Persons attending meetings or conferences; expressions or statements of policy; reports or summaries of investigations, opinions, or reports of consultants; non-privileged communications with attorneys; records of summaries of negotiations; contracts and agreements; brochures; pamphlets; advertisements; circulars; trade letters; press releases; drafts of any documents; and revisions of drafts of any documents. For purposes of these interrogatories, “Document” shall also mean any of the foregoing not in Opposer’s possession, custody or control, the existence of which is known to Opposer. For purposes of these interrogatories, any such Document bearing on any sheet or side thereof any marks of any kind, such as initials, stamped indicia, comments or notations, which was not part of the originally created Document, is to be considered and identified as a separate Document.

(5) “Thing” means any physical object other than a Document.

- (6) “Trademark” and “Mark” mean trademark, service mark, or design mark.
- (7) “Opposer mark” means the following marks and specified goods/services listed in


Opposer’s Notice of Opposition unless otherwise specified:

MARK	GOODS	REG. NO. & DATE
	<p>Clothing and outdoor clothing, namely, T-shirts, shirts, trousers, jackets, and headwear (Class 25)</p>	<p>2915717</p> <p>Reg. Date: January 4, 2005</p>
	<p>Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury (Class 9)</p> <p>Bags, namely, spoiling bags in the nature of all-purpose carrying bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belts, hydration packs, namely, backpacks compatible with personal hydration systems sold empty, compressor bags, namely, bags which compress horizontally or vertically via attached straps, shoulder bags, messenger bags, book bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags, boston bags, backpacks with internal and external frames, backpack bottle pockets, rain covers designed for use with backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats (Class 18)</p> <p>Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping</p>	<p>5075756</p> <p>Reg. Date: November 8, 2016</p>

	<p>bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses (Class 20)</p> <p>Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets; jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; athletic tops and bottoms for gymnastics; one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding; sandals; headgear, namely, caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts (Class 25)</p> <p>Snowshoes (Class 28)</p> <p>Advertising; business management; business administration; office functions; wholesale and retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order catalogue services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods excluding the transport thereof consisting of clothing, footwear and</p>	
--	---	--

	headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coders, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device (Class 35)	
66°N	<p>Crampons being climbing irons (Class 6)</p> <p>Ice picks; pocket knives (Class 8)</p> <p>Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury (Class 9)</p> <p>Bags, namely, all-purpose sporting bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belt bags, hydration packs, namely backpacks compatible with personal hydration systems sold empty, compressor traveling bags in the nature of bags which compress horizontally or vertically via attached straps, shoulder bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags in the nature of rucksacks for mountaineers, Boston bags, backpacks with internal and external frames, backpack bottle pockets, fitted protective rain covers used to cover backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats (Class 18)</p> <p>Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses (Class 20)</p>	<p>5075773</p> <p>Reg. Date: November 8, 2016</p>

	<p>Drinking flasks; hip flasks; insulating flasks; drinking flasks for travelers (Class 21)</p> <p>Tents; tent accessories, namely, tent storage bags, rain flies; vinyl ground cloths, tent poles sold as integral components of tents, tent pole storage sacks sold as an integral component of and being a feature of tent storage bags, and gear loft platforms used for storage, specially adapted for tents comprising of a mesh cloth or net that ties to loops suspended from the top of a tent used for storage (Class 22)</p> <p>Mattress covers for travels; sleeping bag liners; microfiber towels for travel; face towels of textile for travels; travelling rugs (Class 24)</p> <p>Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets, jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; tops and bottoms for gymnastics, one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats, waterproof clothing in the nature of waterproof tops and bottoms; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding, sandals; headgear, namely caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts (Class 25)</p> <p>Snowshoes; skis; ski bindings; ski poles; bags adapted for skis; fitted protective covers specially adapted for skis; snowboards; bindings for snowboards; zip line apparatus for recreational purposes (Class 28)</p> <p>Advertising; business management; business administration; office functions; wholesale and retail store services relating to clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail</p>	
--	---	--


	<p>store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order services, catalogue ordering services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods, excluding the transport thereof, such goods consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets, enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device (Class 35)</p> <p>Education services, namely, providing classes, lectures, seminars, and workshops in the fields of camping, outdoor activities and sporting activities; providing of training services in the fields of camping, outdoor activities and sporting activities; organizing sporting and cultural events; providing training services and educational services in the nature of providing classes in the fields of sporting activities, and camping and outdoor activities, and in the use of outdoor gear and equipment; arranging seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking (Class 41)</p>	
	<p>Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury (Class 9)</p> <p>Bags, namely spoiling bags in the nature of all-purpose carrying bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks,</p>	<p>5084208</p> <p>Reg. Date: November 22, 2016</p>

	<p>book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belts, hydration packs, namely backpacks compatible with personal hydration systems sold empty, compressor bags, namely bags which compress horizontally or vertically via attached straps, shoulder bags, messenger bags, book bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags, boston bags, backpacks with internal and external frames, backpack bottle pockets, rain covers designed for use with backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats (Class 18)</p> <p>Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses (Class 20)</p> <p>Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets; jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; athletic tops and bottoms for gymnastics; one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding; sandals; headgear, namely, caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts (Class 25)</p> <p>Snowshoes (Class 28)</p>	
--	---	--

	<p>advertising; business management; business administration; office functions; wholesale and retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order catalogue services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods excluding the transport thereof consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coders, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device (Class 35)</p>	
<p>66°NORTH</p>	<p>Crampons being climbing irons (Class 6) Ice picks; pocket knives (Class 8) Life belts; protective helmets; ski helmets; snowboard helmets; eyewear, eye glasses, ski glasses, sun glasses, sport glasses; safety clothing, footwear and headwear for protection against accident or injury (Class 9) Bags, namely, all-purpose sporting bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs,</p>	<p>5088873 Reg. Date: November 29, 2016</p>

	<p>hip belt bags, hydration packs, namely, backpacks compatible with personal hydration systems sold empty, compressor traveling bags in the nature of bags which compress horizontally or vertically via attached straps, shoulder bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags in the nature of rucksacks for mountaineers, Boston bags, backpacks with internal and external frames, backpack bottle pockets, fitted protective rain covers used to cover backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats (Class 18)</p> <p>Sleeping bags; fitted covers for sleeping bags; sleeping bag pads; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes; bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors; camping mattresses (Class 20)</p> <p>Drinking flasks; hip flasks; insulating flasks; drinking flasks for travelers (Class 21)</p> <p>Tents; tent accessories, namely, tent storage bags, rain flies; vinyl ground cloths, tent poles sold as integral components of tents, tent pole storage sacks sold as an integral component of and being a feature of tent storage bags, and gear loft platforms used for storage, specially adapted for tents comprising of a mesh cloth or net that ties to loops suspended from the top of a tent used for storage (Class 22)</p> <p>Mattress covers for travels; sleeping bag liners; microfiber towels for travel; face towels of textile for travels; travelling rugs (Class 24)</p> <p>Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets, jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys, children's bottoms and tops, dresses; tops and bottoms for gymnastics, one piece shell suits for</p>	
--	--	--

	<p>adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats, waterproof clothing in the nature of waterproof tops and bottoms; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding, sandals; headgear, namely, caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts (Class 25)</p> <p>Snowshoes; skis; ski bindings; ski poles; bags adapted for skis; fitted protective covers specially adapted for skis; snowboards; bindings for snowboards; zip line apparatus for recreational purposes (Class 28)</p> <p>Advertising; business management; business administration; office functions; wholesale and retail store services relating to clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order services, catalogue ordering services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods, excluding the transport thereof, such goods consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and</p>	
--	--	--

	<p>bicycle accessories including bicycle trailers and helmets, enabling customers to conveniently view and purchase those goods via the Internet or via wireless electronic communication device (Class 35)</p> <p>Education services, namely, providing classes, lectures, seminars, and workshops in the fields of camping, outdoor activities and sporting activities; providing of training services in the fields of camping, outdoor activities and sporting activities; organizing sporting and cultural events; providing training services and educational services in the nature of providing classes in the fields of sporting activities, and camping and outdoor activities, and in the use of outdoor gear and equipment; arranging seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking (Class 41)</p>	
	<p>bags, namely, all-purpose sporting bags, backpacks, hiking bags, hiking rucksacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, sacks in the nature of drawstring bags used as backpacks, messenger bags, hip and lumbar packs, hip belt bags, hydration packs, namely, backpacks compatible with personal hydration systems sold empty, compressor traveling bags in the nature of bags which compress horizontally or vertically via attached straps, shoulder bags, waist packs, fanny packs, belt bags, satchels, tent storage bags, mountaineering bags in the nature of rucksacks for mountaineers, Boston bags, backpacks with internal and external frames, backpack bottle pockets, fitted protective rain covers used to cover backpacks and carrying bags; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; shoulder harnesses, shoulder belts being straps of leather; walking sticks, alpenstocks, trekking poles, hiking poles, hiking sticks, walking staffs, umbrellas, parasols, walking stick handles, walking stick seats (Class 18)</p> <p>Clothing, namely, T-shirts, shirts, tops, sweatshirts, sweatpants, pants, shorts, trousers, vests, parkas, pullovers, anoraks, coats, jackets, jacket hoods, sweaters, coveralls, jumpers, underwear, gloves, snowboarding gloves, ski gloves, neck gaiters, gaiter straps, mittens, leg gaiters and ankle gaiters, jerseys,</p>	<p>5088874</p> <p>Reg. Date: November 29, 2016</p>

	<p>children's bottoms and tops, dresses; tops and bottoms for gymnastics, one piece shell suits for adults and children, shell tops and bottoms, ski wear, overalls, bib pants, bib overalls, snow pants, wind-resistant jackets, snow suits; rainwear, raincoats, waterproof clothing in the nature of waterproof tops and bottoms; leggings; ponchos; pajamas; skirts; uniforms; footwear; socks, stockings, tights, shoes, athletic shoes, sneakers, hiking shoes, boots, hiking boots, ski boots, boots for snowboarding, sandals; headgear, namely, caps and hats; headbands, scarves, bandanas, balaclavas, visors, ear muffs, skull caps; belts (Class 25)</p> <p>Snowshoes (Class 28)</p> <p>Advertising; business management; business administration; office functions; wholesale and retail store services relating to clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets; on-line retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; retail store services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; mail order services, catalogue ordering services and wholesale distributorship services featuring clothing, footwear and headwear, in particular outerwear and sportswear, work clothing, rescue clothing, safety clothing, and protective clothing, outdoor and sporting goods; the bringing together, for the benefit of others, of a variety of goods, excluding the transport thereof, such goods consisting of clothing, footwear and headwear, in particular outerwear and sportswear and related goods, watches, eyewear, binoculars, scopes, knives and cutlery, outdoor camping tools and utensils, portable coolers, tents, bags, packs, sleeping bags, towels, bicycles and bicycle accessories including bicycle trailers and helmets, enabling customers to conveniently view</p>	
--	---	--

	and purchase those goods via the Internet or via wireless electronic communication device (Class 35)	
--	--	--

(8) “Specify” means to provide full and detailed information.

(9) Where identification of any Document or Thing is required by use of the word “Identify,” such identification should be sufficient to support a request for the production of the Document or Thing under Rule 34 of the Federal Rules of Civil Procedure, and should include by way of illustration but without limitation the following information, even if Opposer intends to object to the production of said Document or Thing:

- (a) the type of the Document or Thing, i.e., whether it is a letter, memorandum, report, drawing, chart, etc.;
- (b) the general subject matter of the Document or Thing;
- (c) the name of the creator of the Document or Thing;
- (d) any numerical designation appearing on the Document or Thing, such as a drawing number, sample number or file references; and
- (e) if the Document or Thing is not in Opposer’s possession, custody, or control, the identity, as defined herein below, of the Person having possession, custody or control of said Document or Thing.

(10) Where the identification of a Document or Thing is required by use of the word “Identify,” Opposer may, in lieu of identification, at the time Opposer serves its answers to these interrogatories, mail to Applicant the original of such Document or Thing, or a legible copy or photograph of such Document or Thing, suitably labeled and marked to show to which Interrogatory each Document or Thing is being produced in lieu of identification.

(11) Where the identification of any individual Person is required by use of the word “Identify,” such identification should be sufficient to identify the Person in a notice of taking the deposition of such Person, and should include without limitation the following information concerning such Person:

- (a) full name;
- (b) business address;
- (c) job title;
- (d) employer or professional affiliations; and
- (e) home address.

(12) Where the identification of any Person, other than an individual, is required by use of the word “Identify,” such identification should be sufficient to identify the Person in a notice of taking the deposition of such Person, and should include without limitation the following information concerning such Person:

- (a) the full name or title;
- (b) principal place of business;
- (c) nature or type of entity;
- (d) the state of incorporation or registration; and
- (e) the principal business conducted by such Person.

(f) If Opposer is aware that a Document or Thing (or a group of Documents or Things) once existed but has been destroyed, Opposer is requested to state when the Document or Thing (or group of Documents or Things) was destroyed, who destroyed it, why it was destroyed, and the circumstances under which it was destroyed.

(13) These Interrogatories shall be deemed continuous and Opposer shall be obligated to change, supplement and amend its answers hereto as prescribed by Rule 26(e) of the Federal Rules of Civil Procedure.

(14) The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within the interrogatories all information which might otherwise be construed as outside their scope.

(15) The singular shall include the plural and the present tense shall include the past tense and vice versa in order to bring within the scope of the interrogatory all information which might otherwise be construed to be outside its scope.

(16) If Opposer objects to any of the interrogatories below based on a claim of privilege or a claim that such interrogatories require the disclosure of attorney work product, state the nature of the privilege claimed and the nature of the information over which privilege is claimed.

INTERROGATORIES

1. Identify each Person having knowledge about the clearance, selection and adoption of Opposer’s mark.
2. Identify the Person having the greatest knowledge about advertising, promotion and use or intended use of Opposer’s mark in the United States.
3. Specify the date when Opposer first adopted or intended to use Opposer’s mark, and when Opposer first used the designation "66°NORTH " or “66°N” on Opposer’s goods/services in the United States.
4. Identify and describe each and every good or service in connection with which Opposer has used Opposer’s mark.

5. Specify the date of first use in commerce in the United States of Opposer's mark in connection with each good or service to be identified in response to Interrogatory No. 4, the manner of such use or intended use, the geographic territory in which such use has occurred or is intended to occur, and the types or classes of customers who were exposed to such use, and identify all Documents referring or relating to such first use.
6. Describe with specificity how Opposer created the "66°NORTH" or "66°N" mark and why 66°NORTH/66°N was the brand name chosen as the trademark for Opposer's goods and services.
7. Specify the channels of trade currently used or intended to be used by Opposer for marketing, promoting and selling Opposer's goods or services on or in connection with Opposer's mark.
8. Specify all actions taken by Opposer that supports Opposer's intent to all of Opposer's marks listed in No. 7 of the *Definitions & Instructions* Section in the U.S. in connection with the goods and services in classes 6, 8, 9, 18, 20, 21, 22, 24, 25, 28, 35 and 41.
9. Identify each person or agency that has participated in the creation, advertising and/or promotion of Opposer's mark, and the period of time during which each such person or agency has participated.
10. Identify each person having information relating to any formal or informal trademark searches or investigations, which relate to the terms NORTH or 66°, whether alone, in combination with other terms or with different spellings/pronunciations, and identify all documents relating to the searches or investigations.

11. State Opposer's yearly expenditures to date with respect to the advertising and promotion of Opposer's mark in conjunction with all goods or services since sales first began under Opposer's mark in the U.S.
12. Describe the circumstances under which Opposer first became aware of Applicant's use or registration of Applicant's mark and identify all persons involved.
13. Specify the approximate gross revenue including, but not limited to, projected revenue generated by sales of Opposer's goods or services under Opposer's mark for each year since such sales began in the U.S. to the present.
14. Identify all instances in which any person has been or claimed to be confused, mistaken, or deceived as to the relationship between Opposer and any other entity, or as to the products or services of Opposer and any other entity.
15. Identify all trade shows at which Opposer has attended or promoted its goods and/or services under Opposer's mark, and all trade shows it plans to attend in the future to promote Opposer's mark.
16. Identify each person that Opposer expects to call as a witness in this proceeding, and state the subject matter on which such witness is expected to testify.
17. Identify with specificity all retail and/or wholesale outlets in which Opposer provides and intends to provide goods or services in connection with Opposer's mark, and fully provide the names and addresses of all such entities.
18. Identify with specificity any other circumstances in which Opposer's mark has been or will be used in the marketplace as a trademark, outside of the places mentioned in response to Paragraph 17 of Applicant's First Set of Interrogatories.

19. Specify whether Opposer intends to expand the goods offered under Opposer's mark to other goods or services, other channels of trade, or other geographic territories, and identify all documents relating or referring to such expansion.
20. Specify the meaning of, and intent behind, Opposer's use of 66°NORTH or 66°N.

NORTH 61 LLC

By its attorneys,

Date: April 10, 2018

/s/ Patrick R. Burns
Patrick R. Burns
BURNS LAW FIRM PLLC
1624 HARMON PLACE, STE 300
MINNEAPOLIS, MN 55403
patrick@burns-law.mn

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing APPLICANT'S FIRST SET OF INTERROGATORIES was served upon the following attorney of record for Opposer via email, this 10th day of April, 2018:

MICHELE S. KATZ
ADVITAM IP LLC
150 N WACKER DRIVE, SUITE 2400
CHICAGO, IL 60606
mskdocket@advitamip.com, atokarz@advitamip.com, mkatz@advitamip.com

/s/ Patrick R. Burns

Patrick R. Burns

EXHIBIT 10

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

SJOKLAEDAGERDIN HF)	
Opposer,)	Opposition No. 91237366
)	
v.)	Mark: NORTH 61
)	
NORTH 61 LLC)	App. No.: 87/358942
)	App. Filing Date: Mar. 05, 2017
Applicant.)	
)	

APPLICANT’S FIRST SET OF REQUESTS FOR ADMISSIONS

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Applicant, North 61 LLC, requests that Opposer, Sjoklaedagerdin hf, respond by admitting the truthfulness of the matters set forth below, within the time specified by the Federal Rules of Civil Procedure and the Trademark Rules of Practice.

DEFINITIONS AND INSTRUCTIONS

The Definitions and Instructions included in Applicant’s First Set of Interrogatories are incorporated herein by reference.

MATTERS TO BE ADMITTED

1. The mark NORTH 61 is not identical in sound to the mark 66° NORTH or 66°N.
2. The use of the symbol “°” in Opposer’s mark means “degrees.”
3. Opposer’s mark is intended to convey the commercial impression of “66 degrees north,” which is the 66th parallel north, a circle of latitude that is 66 degrees north of the Earth's equatorial plane where Iceland, Opposer’s origin, is located.
4. The mark NORTH 61 differs in appearance from 66° NORTH or 66°N.
5. The mark NORTH 61 has a different meaning to 66° NORTH and 66°N.

6. The mark NORTH 61 connotes a different commercial impression from 66° NORTH and 66°N.
7. Opposer does not have exclusive rights to the use of the term NORTH for clothing in the U.S.
8. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for clothing.
9. Opposer does not have exclusive rights to the use of the term NORTH for class 18 bags in the U.S.
10. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for class 18 goods.
11. Opposer does not have exclusive rights to the use of the term NORTH for class 35 services in the U.S.
12. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for class 35 retail store services featuring clothing, bags, sporting goods, novelty items, key chains, mugs, posters and stickers.

NORTH 61 LLC

By its attorneys,

Date: April 10, 2018

 /s/ Patrick R. Burns
Patrick R Burns
Burns Law Firm PLLC
1624 Harmon Place, Ste 300
Minneapolis, MN 55403
patrick@burns-law.mn

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing APPLICANT'S FIRST SET OF REQUESTS FOR ADMISSIONS was served upon the following attorney of record for Opposer via email this 10th day of April, 2018:

Michele S Katz
Advitam IP LLC
150 N Wacker Drive, Suite 2400
Chicago, IL 60606

Mskdocket@Advitamip.Com, Atokarz@Advitamip.Com, Mkatz@Advitamip.Com

/s/ Patrick R. Burns

Patrick R. Burns

EXHIBIT 11

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

SJOKLAEDAGERDIN HF,

Opposer,

v.

NORTH 61 LLC,

Applicant.

Opposition No. 91237366

Application Ser. No. 87/358942

Mark: **NORTH 61**

**APPLICANT'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS AND THINGS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Applicant requests that Opposer produce and mail to Applicant's attorney, within the time specified by the Federal Rules of Civil Procedure and the Trademark Rules of Practice, copies of the following Documents and Things which are in Opposer's possession, custody, or control.

DEFINITIONS AND INSTRUCTIONS

The Definitions and Instructions included in Applicant's First Set of Interrogatories are incorporated herein by reference.

(1) These requests shall be deemed continuous and Opposer shall be obligated to change, supplement and amend its answers hereto, if and when filed, as prescribed by Rule 26(e) of the Federal Rules of Civil Procedure.

(2) If Opposer objects to the production of any document, which falls within a request based on a claim of privilege or a claim that such documents constitute attorney work product, the following information is requested:

(a) The date of the document;

- (b) The name of the document's originator, the name of the person to whom it is addressed and the names of all persons who were shown copies;
- (c) A general description of the type of document and the subject matter to which it pertains; and
- (d) The basis for withholding the document.

DOCUMENTS AND THINGS TO BE PRODUCED

DOCUMENT REQUEST NO 1: All documents identified by Opposer in response to Applicant's First Set of Interrogatories.

DOCUMENT REQUEST NO 2: A representative sampling of logotypes and designs that incorporate any 66° NORTH or 66°N mark that Opposer has used, is presently using, or is planning to use in the U.S.

DOCUMENT REQUEST NO 3: All documents relating to communications with third parties, other than your counsel, concerning the continued use and registration of the opposer's mark.

DOCUMENT REQUEST NO 4: All documents relating to any actual confusion between Opposer and third parties regarding Opposer's mark.

DOCUMENT REQUEST NO 5: All documents relating to any incident or proceeding in which a third party has challenged Opposer's use or registration of, or the rights Opposer claims in Opposer's mark, including but not limited to any demand to cease and desist.

DOCUMENT REQUEST NO 6: All documents relating to any incident or proceeding in which Opposer has challenged the rights of a third party (not including Applicant) based on the rights Opposer claims to Opposer's mark, including but not limited to any demand to cease and desist.

DOCUMENT REQUEST NO 7: All documents relating to any investigation, trademark search, and/or other inquiry conducted by Opposer, and/or on Opposer's behalf, in connection with assessing the availability, registrability, or use of Opposer's mark in the U.S.

DOCUMENT REQUEST NO 8: All documents relating to studies, tests, ratings, and/or surveys in connection with Opposer's mark or Opposer's goods/services.

DOCUMENT REQUEST NO 9: Documents sufficient to identify every good and services on or in connection with which Opposer has used or is using Opposer's mark in the U.S.

DOCUMENT REQUEST NO 10: All documents related to Opposer's intended use of Opposer's mark in connection with Opposer's goods and services in the U.S.

DOCUMENT REQUEST NO 11: All documents related to communications directed to, addressed to, or intended for Applicant but received by Opposer.

DOCUMENT REQUEST NO 12: All documents prepared or considered by any expert employed by Opposer in connection with its formation of an opinion concerning the subject matter of this Opposition.

DOCUMENT REQUEST NO 13: All documents which Opposer believes provide any support for each response in Opposer's Answers to Applicant's First Set of Interrogatories.

DOCUMENT REQUEST NO 14: Documents and things which list the different geographic areas where Opposer's goods and services are sold or offered for sale.

DOCUMENT REQUEST NO 15: Documents and things which list the different retail stores where Opposer's goods and services are sold or offered in the U.S.

DOCUMENT REQUEST NO 16: A representative sampling of advertising and promotional material for Opposer's goods and services.

DOCUMENT REQUEST NO 17: Documents and things that show placement and/or the recommended placement of Opposer's products/services in retail stores, including any planograms sent to retailers.

DOCUMENT REQUEST NO 18: Documents and things that refer and/or describe the target consumers of Opposer's goods and services in the U.S.

DOCUMENT REQUEST NO 19: Documents and things that refer to and/or describe
Opposer's intended meaning of Opposer's mark.

DOCUMENT REQUEST NO 20: Documents and things that refer to and/or describe the use
of the term NORTH as a trademark in the U.S. in connection with goods and services in classes
16, 18, 25 and 35.

Date: April 10, 2018

/s/ Patrick R. Burns
Patrick R. Burns
Burns Law Firm PLLC
1624 Harmon Place, Ste 300
Minneapolis, MN 55403
patrick@burns-law.mn

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing APPLICANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS has been served via email, this ____ day of April, 2018 as follows:

MICHELE S KATZ
ADVITAM IP LLC
150 N WACKER DRIVE, SUITE 2400
CHICAGO, IL 60606
mskdocket@advitamip.com , atokarz@advitamip.com,
mkatz@advitamip.com

Date: April 10, 2018

/s/ Patrick R. Burns
Patrick R. Burns

EXHIBIT 12

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

OPPOSER’S RESPONSE TO APPLICANT’S FIRST SET OF INTERROGATORIES

Pursuant to Rule 33, Fed. R. Civ. P., and Rules 2.116 and 2.120 of the Trademark Rules of Practice, Applicant provides the following answers to the first set of interrogatories of Applicant. Opposer has used its best efforts to obtain the information subject to the following general and specific objections. Opposer reserves the right to supplement its responses.

GENERAL OBJECTIONS

1. These responses are limited to the information that is currently available to Opposer and documents, which have been located to date.

2. Opposer has not completed its investigation or preparation for the adjudication of this matter. Accordingly, these responses are made without prejudice to the right of Opposer to make further objections and present additional information which is hereafter discovered or which further discovery and investigation may indicate is relevant to this action and called for by this set of document requests.

3. These general objections are applicable to each and every one of the following responses and objections, and failure to repeat an objection to a specific document request shall

not be deemed a waiver of such an objection. Furthermore, when Opposer specifically repeats one or more of these general objections in response to a specific document request, such a specific response shall not be deemed a waiver of these general objections. Finally, when a response references Opposer's response to another request, the reference should be deemed to include both the other response and the objections raised in the other response.

4. Opposer reserves all rights to object as to the competency, relevancy, materiality, and admissibility of the responses to these document requests.

5. Opposer reserves all rights to object on any ground to the use of any of these responses to these documents requests in any subsequent proceeding including the adjudication of this or any other action.

6. Opposer objects to Applicant's requests, definitions and instructions to the extent that Applicant seeks to impose on Opposer obligations beyond those of the Federal Rules of Civil Procedure, the Trademark Trial and Appeal Board Rules, applicable orders or decisions in this proceeding, or any stipulation or agreement of the parties to this proceeding.

7. Opposer objects to Applicant's requests, definitions and instructions to the extent that they are vague and ambiguous.

8. To the extent that any of these document requests include material covered by the attorney-client privilege or work-product doctrine, they are objected to.

9. Opposer objects to these document requests to the extent they seek proprietary or confidential business information. Opposer will produce such relevant information only pursuant to the Stipulated Protective Order entered into in this case.

10. Opposer objects generally to the definitions set forth in Applicant's Interrogatories. Opposer's responses to Applicant's requests do not constitute representations or

admissions that Opposer agrees or adopts any of Applicant's definitions. The Specific Responses set forth below are based on Opposer's interpretation of the language used in Applicant's requests, and Opposer reserves its right to amend or supplement its responses should Applicant assert an interpretation that differs from Opposer's interpretation.

11. Opposer objects to Applicant's use of phrases such as "all documents and things concerning" and the like as overly broad and unduly burdensome to the extent that they encompass, *inter alia*, chance references to potentially responsive subject matter in documents that would not reasonably be expected to contain such references and would require an unreasonably detailed and extensive search of all of Opposer's documents and files to locate.

12. Opposer objects to Applicant's requests to the extent that they seek expert discovery on the grounds that they are premature.

INTERROGATORIES

1. Identify each person having knowledge about the clearance, selection and adoption of Opposer's mark.

ANSWER: Opposer is still investigating and reserves the right to supplement answer.

2. Identify the Person having the greatest knowledge about advertising, promotion and use or intended use of Opposer's mark in the United States.

ANSWER: Helgi Rúnar Óskarsson, CEO and Bjarney Hardardóttir Head of Business Development.

3. Specify the date when Opposer first adopted or intended to use Opposer's mark, and when Opposer first used the designation "66°NORTH" or "66°N" on Opposer's goods/services in the United States.

ANSWER: At least as early as 2006. Opposer is still investigating and reserves the right to supplement answer.

4. Identify and describe each and every good or service in connection with which Opposer has used Opposer's mark.

ANSWER: Opposer objects to this interrogatory as unduly burdensome and overly broad. In addition, opposer objects to this interrogatory on relevancy grounds as the Board can only rule on issues of registrability and not use.

5. Specify the date of first use in commerce in the United States of Opposer's mark in connection with each good or service to be identified in response to Interrogatory No. 4, the manner of such use or intended use, the geographic territory to which such use has occurred or is intended to occur, and the types or classes of customers who were exposed to such use, and identify all Documents referring or relating to such first use.

ANSWER: Opposer objects to this interrogatory as unduly burdensome and overly broad. In addition, opposer objects to this interrogatory on relevancy grounds as the Board can only rule on issues of registrability and not use.

6. Describe with specificity how Opposer created the "66°NORTH" or "66°N" mark and why 66°NORTH/66°N was the brand name chosen as the trademark for Opposer's goods and services.

ANSWER: According to Opposer's website at <https://www.66north.com/us/about-us/our-heritage/>, 66°North was founded in 1926 by Hans Kristjánsson with the purpose of making protective clothing for Icelandic fishermen and workers braving the North Atlantic elements. Hans Kristjansson lived in Suðureyri in Súgandafjörður in Westfjords of Iceland where weather conditions were very harsh and right clothing was therefore a matter of life and death for Icelandic fishermen.

Hans was passionate about creating garments that would hold up to the harsh conditions fishermen faced while trolling the seas of Iceland so he moved to Norway to learn how to tailor and sew fishermen's clothing. When Hans moved back to Suðureyri he founded Sjóklæðagerð

Íslands now better known as 66°North. 66°North derives its name from the latitudinal line of the Arctic Circle which touches Ségandafjörður where the company was founded in 1926.

7. Specify the channels of trade currently used or intended to be used by Opposer for marketing, promoting and selling Opposer's goods or services on or in connection with Opposer's mark.

ANSWER: Opposer's products are sold in Moosejaw stores <https://www.moosejaw.com/moosejaw/shop/home>.

8. Specify all actions taken by Opposer that supports Opposer's intent to all of Opposer's marks listed in No. 7 of the *Definitions & Instructions* Section in the U.S. in connection with the goods and services in classes 6, 8, 9, 18, 20, 21,22, 24, 25, 28, 35 and 41.

ANSWER: Opposer objects to this interrogatory as unduly burdensome and overly broad. In addition, opposer objects to this interrogatory on relevancy grounds as applicant's application only covers goods/services in Classes 16, 25 and 35.

9. Identify each person and agency that has participated in the creation, advertising and/or promotion of Opposer's mark, and the period of time during which each person or agency has participated.

ANSWER: Opposer objects to this interrogatory as unduly burdensome and overly broad as Opposer has been in business globally since 1926. Opposer has recently used J&L agency, based in Iceland. <http://www.jl.is/>

10. Identify each person having information relating to any formal or informal trademark searches or investigations, which related to the terms NORTH or 66°, whether alone, or in combination with other terms or with different spellings/pronunciations, and identify all documents relating to the searches or investigations.

ANSWER: Opposer is still investigating and reserves the right to supplement answer. Any such documents related to the searches and/or investigations are privileged attorney-client and/or work product.

11. State Opposer's yearly expenditures to date with respect to the advertising and promotion of Opposer's mark in conjunction with all goods or services since sales first began under Opposer's mark in the U.S.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response to the extent relevant.

12. Describe the circumstances under which Opposer first became aware of Applicant's use or registration of Applicant's mark and identify all persons involved.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response.

13. Specify the approximate gross revenue including, but not limited to, projected revenue generated by sales of Opposer's goods or services under Opposer's mark for each year since such sales began in the U.S. to the present.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response to the extent relevant.

14. Identify all instances in which any person has been or claimed to be confused, mistaken, or deceived as to the relationship between Opposer and any other entity, or as to the products or services of Opposer and any other entity.

ANSWER: Opposer objects this interrogatory on grounds of relevancy. The likely confusion between Opposer and any third parties is not at issue in this proceeding.

15. Identify all trade shows at which Opposer has attended or promoted its goods and/or services under Opposer's mark, and all trade shows it plans to attend in the future to promote Opposer's mark.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response.

16. Identify each person that Opposer expects to call as a witness in this proceeding, and state the subject matter on which such witness is expected to testify.

ANSWER: Opposer incorporates herein by reference those individuals identified in the parties' initial disclosures and will provide its expert disclosures in due course and by the July 14, 2018 deadline.

17. Identify with specificity all retail and/or wholesale outlets in which Opposer provides and intends to provide goods or services in connection with Opposer's mark, and fully provide the names and addresses of all such entities.

ANSWER: See Answer to Paragraph 7, *infra*. Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response.

18. Identify with specificity any other circumstances in which Opposer's mark has been or will be used in the marketplace as a trademark, outside of places mentioned in response to Paragraph 17 of Applicant's First Set of Interrogatories.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response.

19. Specify whether Opposer intends to expand the goods offered under Opposer's mark to other goods or services, other channels of trade, or other geographic territories, and identify all documents relating or referring to such expansion.

ANSWER: Opposer intends to expand. Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response to the extent relevant.

20. Specify the meaning of, and intent behind Opposer's use of 66°NORTH or 66°N.

ANSWER: Opposer is not aware of any meaning the mark has other than as a trademark.

Respectfully submitted,

Dated: May 10, 2018

/s/ Michele S. Katz
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S RESPONSE TO APPLICANT'S FIRST SET OF INTERROGATORIES is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: May 10, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 13

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

OPPOSER’S RESPONSE TO APPLICANT’S REQUEST FOR ADMISSIONS

Pursuant to Rule 36 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, Opposer hereby submits the following objections and answers to Applicant’s Request for Admissions.

GENERAL OBJECTIONS

The objections included in Opposer’s Responses to Applicant’s Interrogatories are incorporated herein by reference.

MATTERS TO BE ADMITTED

1. The mark NORTH 61 is not identical in sound to the mark 66°NORTH or 66°N.

ANSWER: Admitted.

2. The use of the symbol “°” in Opposer’s mark means “degrees.”

ANSWER: Admitted.

3. Opposer’s mark is intended to convey the commercial impression of “66 degrees north,” which is the 66th parallel north, a circle of latitude that is 66 degrees north of the Earth’s equatorial plane where Iceland, Opposer’s origin, is located.

ANSWER: The first clause is admitted; the second clause is denied.

4. The mark NORTH 61 differs in appearance from 66° NORTH or 66°N.

ANSWER: Denied, as any differences between the marks identified in paragraph 4 are slight.

5. The mark NORTH 61 has a different meaning to 66°NORTH and 66°N.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

6. The mark NORTH 61 connotes a different commercial impression from 66°NORTH and 66°N.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

7. Opposer does not have exclusive rights to the use of the term NORTH for clothing in the U.S.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

8. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for clothing.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

9. Opposer does not have exclusive rights to the use of the term NORTH for class 18 bags in the U.S.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

10. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for class 18 goods.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

11. Opposer does not have exclusive rights to the use of the term NORTH for class 35 services in the U.S.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

12. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for class 35 retail store services featuring clothing, bags, sporting goods, novelty items, key chains, mugs, posters and stickers.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

Respectfully submitted,

Dated: May 10, 2018

/s/ Michele S. Katz
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S RESPONSE TO APPLICANT'S REQUEST FOR ADMISSIONS is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: May 10, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 14

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

**OPPOSER’S RESPONSE TO APPLICANT’S REQUEST FOR
DOCUMENTS AND THINGS**

Pursuant to 37 C.F.R. 2.120 and Rules 26 and 34 of the Federal Rules of Civil Procedure, Opposer hereby responds to the following requests for production of documents and things.

GENERAL OBJECTIONS

The objections included in Opposer’s Responses to Applicant’s Interrogatories are incorporated herein by reference.

DOCUMENTS AND THINGS TO BE PRODUCED

1. All documents identified by Opposer in response to Applicant’s First Set of Interrogatories.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

2. A representative sampling of logotypes and designs that incorporate any 66° NORTH or 66°N mark that Opposer has used, is presently using, or is planning to use in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

3. All documents relating to communications with third parties, other than your counsel, concerning the continued use and registration of the opposer's mark.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

4. All documents relating to any actual confusion between Opposer and third parties regarding Opposer's mark.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Moreover, Opposer objects to this document request on grounds of relevancy as any actual confusion between Opposer and third parties is not relevant to the present opposition. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

5. All documents relating to any incident or proceeding in which a third party has challenged Opposer's use or registration of, or the rights Opposer claims in Opposer's mark, including but not limited to any demand to cease and desist.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible

evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

6. All documents relating to any incident or proceeding in which Opposer has challenged the rights of a third party (not including Applicant) based on the rights Opposer claims to Opposer's mark, including but not limited to any demand to cease and desist.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

7. All documents relating to any investigation, trademark search, and/or other inquiry conducted by Opposer, and/or on Opposer's behalf, in connection with assessing the availability, registrability, or use of Opposer's mark in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

8. All documents relating to studies, tests, ratings, and/or surveys in connection with Opposer's mark or Opposer's goods/services.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

9. Documents sufficient to identify every good and services on or in connection with which Opposer has used or is using Opposer's mark in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible

evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

10. All documents related to Opposer's intended use of Opposer's mark in connection with Opposer's goods and services in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

11. All documents related to communications directed to, addressed to, or intended for Applicant but received by Opposer.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

12. All documents prepared by any expert employed by Opposer in connection with its formation of an opinion concerning the subject matter of this Opposing.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

13. All documents which Opposer believes provide any support for each response in Opposer's Answers to Applicant's First Set of Interrogatories.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

14. Documents and things which list the different geographic areas where Opposer's goods and services are sold or offered for sale.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

15. Documents and things which list the different retail stores where Opposer's goods and services are sold or offered in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place. See responses to interrogatories, para.7, for relevant documents and things.

16. A representative sampling of advertising and promotional material for Opposer's goods and services.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

17. Documents and things that show placement and/or the recommended placement of Opposer's products/services in retail stores, including any planograms sent to retailers.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

18. Documents and things that refer and/or describe the target consumers of Opposer's goods and services in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

19. Documents and things that refer to and/or describe Opposer's intended meaning of Opposer's mark.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

20. Documents and things that refer to and/or describe the use of the term NORTH as a trademark in the U.S. in connection with goods and services in classes 16, 18, 25 and 25.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

Respectfully submitted,

Dated: May 10, 2018

/s/ Michele S. Katz
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S RESPONSE TO APPLICANT'S REQUEST FOR DOCUMENTS AND THINGS is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: May 10, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 15

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

OPPOSER’S INTERROGATORIES TO APPLICANT

Pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure and 37 C.F.R. § 2.120, Sjoklaedagerdin hf (“Opposer” or “Sjoklaedagerdin”), requests that Applicant, North 61, LLC (“Applicant” or “North 61”), respond in writing to the following Interrogatories and Requests for Production of Documents, and produce the documents and things requested for inspection and copying, within thirty days of service hereof. These requests are continuing in nature and impose upon Applicant the obligations stated in Rule 26 of the Federal Rules of Civil Procedure.

INSTRUCTIONS AND DEFINITIONS

- A. These Interrogatories and Document Requests require responses that are complete and accurate as of the date when such responses are made.
- B. Applicant has a duty to amend a response if Applicant obtains information indicating that the response was incorrect when made, or that the response, though correct when made, is no longer true and the circumstances are such that a failure to amend the response is in substance a knowing concealment. Fed.R.Civ.P.26(e)(2).
- C. As used herein, the following definitions apply:

1. **“Communication”**. The term “communication(s)” means the information that has been transmitted (in the form of facts, ideas, inquiries, or otherwise), regardless of means utilized.

2. **“Document”**. The term “document(s)” shall mean any and all documents and things as those terms are defined under and come within the scope of the Federal Rules of Civil Procedure that is or has been in the possession, control, or custody of Applicant or of which Applicant has knowledge, including without limitation: originals, masters and every copy of writings, including but not limited to handwritings, printed, typed or other graphic or photographic matter including film or microfilm, video tape, recordings, correspondence, communications, contracts, agreements, assignments, licenses, purchase orders, invoices, statements, memoranda, notes (in pencil, ink, or typewritten), letters, notebooks, reports, photographs, drawings, tracings, sketches, charts, catalogs, brochures, advertisements, records of communications oral and otherwise, instructions, telegrams, studies, surveys, minutes, reports, calendars, inter-office and intra-office communications, e-mails, price lists, bulletins, circulars, statements, manuals, summaries, maps, charts, graphs, invoices, canceled or voided checks, bills or statistical material.

Additionally, all information stored at any time in any electronic media, including but not limited to electronic mail and active, inactive and archived files, that are or can be made available for retrieval from any electronic storage medium including, but not limited to, hard disks, optical disks, tape storage and the like. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.

If privilege is claimed as to any document, Applicant shall fully identify the document as to date, name, and capacity of the author(s), the name and capacity of all addressees, and the subject and general nature of the document (such as “letter” or “opinion”, etc.). The ground for the claim of privilege shall also be given (such as attorney-client privilege, work product privilege, etc.).

3. **“Data”**. The term “data” shall mean any facts, documents or communications, oral or otherwise, of which Applicant has knowledge, information, or belief.

4. **“Identify”** or **“Specify”**. As used herein, “identify” or “specify” when used in reference to:

(a) a person who is an **individual** shall mean to state his or her full name, present or last known residence address (designating which), and present or last known position or business affiliation (designating which), job title, employment address, and business and residence telephone numbers;

(b) a **juristic person who is a firm, partnership, corporation, proprietorship, association, or other organization or entity** shall mean to state its full name, present or last known address (designating which), telephone number, legal form of such entity or organization, (including state and country of incorporation or organization), and the identity of its last known Chief Executive Officer or person with equivalent title or responsibility.

(c) **data** shall mean to state: in the case of a document, the title (if any), the date, author(s), sender(s), recipient(s), the identity of the persons signing it, type of document (i.e., a letter, memorandum, e-mail, book, telegram, chart, etc.) or some other means of identifying it, its present location or custodian, and whether Applicant is in possession of the original, master, or a copy of the document, and if not in possession of the original, master, or copy to furnish the name and last known address of the custodian of the original, master, or copy; in the case of an oral communication, the date, subject matter, communicator, the recipient of the communication, nature of communication, whether it was recorded, and the identity of any witness thereto; and in the case of a fact, the source thereof.

5. The words/phrases “**identify,**” “**circumstances,**” “**details(s),**” and “**all information,**” whether used alone or in connection with any other words, shall include, but are not limited to, identifying all facts, persons, places, dates, events, documents, physical items of any kind, time periods, geographical locations, data communications of any kind, or any other information in any way related to, pertaining to, connected with, or otherwise responsive to the Interrogatories and Document Request such that all information shall be brought within the scope of the Interrogatories and Document Requests which may otherwise be deemed not covered by the Interrogatories and Document Requests.

6. The words/phrases “**respecting,**” “**relating,**” “**referring to,**” or “**regarding,**” whether used alone or in connection with any other words, shall mean making a statement about, referring to, mentioning, discussing, reflecting, dealing with, consisting of, comprising, recording or in any other way pertaining to the subject either in whole or in part directly or indirectly.

7. The term “consumer” shall mean and include actual and/or intended purchaser(s) of Applicant’s goods/services.

8. The terms “annual gross dollar sales” and “annual advertising and promotional costs” shall mean and include actual and/or projected annual gross dollar sales and actual and/or budgeted annual advertising and promotional costs, respectively

9. The terms “channels of trade”, “channels of distribution”, and “methods of advertising”, shall mean and include actual and/or intended channels of trade, actual and/or intended channels of distribution, and actual and/or intended methods of advertising, respectively.

10. **Parties**. The terms “**Opposer**” and “**Applicant**,” as well as a party’s full or abbreviated name or a pronoun referring to a party, shall mean the parties to this opposition proceeding, and, where applicable, a party’s officers, directors, employees, stockholders, trustees, partners, predecessors, divisions, corporate parent, subsidiaries, affiliates, employees, and agents. The term “**Applicant**” also includes any and all predecessors of or successors to Applicant including, but not limited to, all businesses, partnerships, corporations, associations, firms, proprietorships, organizations or entities in which the Applicant is in any way involved presently or was in the past, through ownership, equity interest, or otherwise, who at any time had or has a right, title or interest in Applicant’s Mark (as defined herein), or any predecessor’s or successor’s mark or mark similar to Applicant’s Mark, or who used or use Applicant’s Mark.

11. **Person**. The term “person” shall include, without limitation, any natural person or any business, business association, business entity, partnership, corporation, legal, or governmental entity. Whenever an Interrogatory requests identification of persons, as to those individuals named in response to the Interrogatory now in the employ of or associated with Applicant, state the title or position, duties and present residence and business address of each such individual. As to those “persons” who have previously been but are not now in the employ of or associated with Applicant, state the periods of employment or association with Applicant, the person’s title or positions during that period, and the last known residence and business address of each such individual.

12. **“And”** and **“Or”**. The connectives “and” and “or” shall be construed conjunctively or disjunctively, as plural and vice versa when necessary, to facilitate the answer to a discovery request.

13. **“Date”**. The term “date” shall mean the exact day, month and year, if ascertainable, or if not, the best approximation, including the temporal relationship to other events.

14. **“Any”**. The term “any” shall mean any and all.

15. **“Opposer’s Marks”**. Unless otherwise specified, the words “Opposer’s Mark” refers to the marks 66°NORTH and/or 66°N as identified in the Notice of Opposition in this proceeding.

16. **“Opposer’s Goods/Services”**. Unless otherwise specified, the words “Opposer’s Goods” refer to those goods/services identified in the Notice of Opposition in this proceeding and any similar or related goods or services provided by Opposer in connection with Opposer’s Marks.

17. **“Applicant’s Mark”**. Unless otherwise specified, the words “Applicant’s Mark” refer to Applicant’s mark NORTH 61 as set forth in U.S. Application Serial No. 87/358942.

INTERROGATORIES

INTERROGATORY NO. 1

Identify and describe in detail each of Applicant’s goods and services that Applicant currently promotes, sells, or provides in connection with those goods/services listed in connection with Applicant’s Mark in the U.S. For each of the goods/services currently promoted, sold and provided, list representative dates of sale for each of Applicant’s goods/services from the date of first use to the present, providing at least one such date for each month in which Applicant’s goods/services were sold, and identify the exact product sold on each of such dates.

INTERROGATORY NO. 2

For each good/service not yet being used in interstate commerce in the U.S. please provide a detailed plan for when Applicant expects to use Applicant’s mark in connection with such goods/services, including the marketing plan for when Applicant expects to launch each remaining good/service detailed in U.S. Application Serial No. 87/358942.

INTERROGATORY NO. 3

Identify all advertising agency, public relations, website design, and/or internet consulting firms used by Applicant in connection with the use, scheduled use, or planned use of Applicant's Mark, including the identity of those persons responsible for Applicant's account with respect to the use, scheduled use, or planned use of Applicant's Mark and the dates each was engaged by Opposer.

INTERROGATORY NO. 4

Identify all persons who now have or previously had any knowledge or responsibility, directly or indirectly, for or relating to any applications, assignments, or other documents filed with the United States Patent and Trademark Office, or any state agency or office, involving Applicant's Mark.

INTERROGATORY NO. 5

Identify representative samples of printed matter, including advertisements, labels, tags, packaging, promotional brochures, web sites, and the like, which contain or bear Applicant's Mark in any form, and which have been or are currently used in connection with the sale, offering for sale, provision, advertising, distribution or marketing of Applicant's goods/services in the U.S. from the date Applicant first began use of Applicant's Mark to the present. Please provide a sample for each month in each year in which use is claimed by Applicant and identify for each sample the date on which it was used.

INTERROGATORY NO. 6

For Applicant's goods/services, identify the individuals who are responsible for or most knowledgeable of Applicant's:

- (a) advertising and promotion of Applicant's goods/services in the U.S.;
- (b) searching and clearance of Applicant's Mark in the U.S.;
- (c) manufacture, sale, distribution, or provision of the Applicant's goods/services in the U.S.;
- (d) trade channels through which Applicant's goods/services are, have been and will be sold in the U.S.; and

- (e) target customers for Applicant's goods/services.

Identify these individuals for each month and year from Applicant's date of first use to the present.

INTERROGATORY NO. 7

Describe any instances of actual confusion, mistake, deception, or false association between Applicant's Mark and Opposer's Mark. For illustrative purposes only, and without limiting the foregoing, such instances would include misdirected mail, e-mail messages, telephone calls, inquiries, requests for information, or customer comments or complaints.

INTERROGATORY NO. 8

Describe all instances in which Applicant has objected to the use, registration, or application for registration of any third party of any mark it believed to be confusingly similar to Applicant's Mark and explain in detail the resolution of each such matter, identify each third party and mark, and identify all documents related thereto.

INTERROGATORY NO. 9

Describe all instances in which Applicant's use, or application to register Applicant's Mark or any similar mark has been the subject of (1) a refusal to register by the U.S. Trademark Office and/or (2) an objection of any kind by a third party and explain in detail the resolution of each such matter, and identify all documents related thereto.

INTERROGATORY NO. 10

Identify all parties to any agreements or understandings relating to the sale or distribution of Applicant's goods/services in the U.S., including, without limitation, all license agreements.

INTERROGATORY NO. 11

(a) Identify any agreements or understandings constituting or relating to the settlement or resolution, or attempted settlement or resolution, of any controversy concerning Applicant's Mark; and

- (b) Identify all the parties to such understandings or agreements.

INTERROGATORY NO. 12

With the exception of this proceeding, identify each civil action or administrative proceeding in the United States or elsewhere in which Applicant is now or has ever been a party and that has involved Applicant's Mark.

INTERROGATORY NO. 13

Identify all studies that refer or relate to the proposed or actual sale, marketing, provision, or advertising of Applicant's goods/services in the U.S., including, without limitation, all advertising studies, consumer studies, and market research studies.

INTERROGATORY NO. 14

State the date and the circumstances under which Applicant first became aware of Opposer's Mark.

INTERROGATORY NO. 15

Identify each investigation of Opposer and/or Opposer's Marks conducted by or on behalf of Applicant, the date of each investigation, the individual conducting each investigation, and the results of each investigation.

INTERROGATORY NO. 16

Identify each search conducted by Applicant at any time for Applicant's Mark or for any mark containing any form of the words "NORTH" and specifically in which classes Applicant conducted the search and the results of the search and whether the search uncovered Opposer's Marks.

INTERROGATORY NO. 17

Identify all third parties of which Applicant is aware who use a mark Applicant believes to be confusingly similar to Applicant's Mark.

INTERROGATORY NO. 18

Identify Applicant's current advertising and promotion expenditures by month since use began in connection with Applicant's goods/services in the U.S. and provide expected yearly advertising and promotion expenditures (by month) over the next five (5) years for those goods/services identifies in connection with Applicant's Mark.

INTERROGATORY NO. 19

Identify Applicant's current gross revenue by month since use began in connection with Applicant's goods/services in the U.S. and provide yearly expected gross revenue (by month) over the next five (5) years for those goods/services identifies in connection with Applicant's Mark.

INTERROGATORY NO. 20

Identify with specificity all goods/services Applicant intends to market in connection with Applicant's Mark in the next three years that are not listed in U.S. Application Serial No. 87/358942.

INTERROGATORY NO. 21

Identify with specificity how Applicant acquires its customers and its customers acquisition cost.

INTERROGATORY NO. 22

Describe Applicant's target customer and provide its marketing plan for the next three (3) years.

INTERROGATORY NO. 23

Describe Applicant's average purchase in dollars, by month since Applicant first launched its website and began selling product on Applicant's website.

INTERROGATORY NO. 24

If Applicant has in-store distribution, identify with specificity a complete list of all of the stores and distributors that currently carry or that Applicant is in talks to carry Applicant's products including the names and addresses of such outlets.

INTERROGATORY NO. 25

If Applicant promotes its products at tradeshows, identify with specificity each and every tradeshow that Applicant has displayed its products or intends to display its products in the next three (3) years, including the name of the tradeshow, when it occurs and where it is located.

INTERROGATORY NO. 26

Identify with specificity how Applicant came up with its mark NORTH 61, what the inspiration was for its name, and what the name means to Applicant.

INTERROGATORY NO. 27

Describe whether Applicant has any plans in the next five (5) years to expand internationally and if so, please identify with specificity which countries it intends to expand to.

INTERROGATORY NO. 28

Identify the name of the proper owner(s) who had the control over Applicant's mark in interstate commerce in the U.S. or intended use in interstate commerce in the U.S. at the time Application Serial No. 87/358942 was filed on August 22, 2017 and provide all related documents thereto.

INTERROGATORY NO. 29

Identify in detail the ongoing business that was sold from Patrick and Patricia Burns to North 61, LLC on June 24, 2017 and provide all documents detailing the asset purchase agreement or other documentation detailing the sale.

INTERROGATORY NO. 30

Identify the date that North 61, LLC was incorporated and provide all documents related thereto.

INTERROGATORY NO. 31

Identify the geographic breakdown of Applicant's website visitors by country since Applicant's website launched.

INTERROGATORY NO. 32

Identify each document upon which Applicant has relied in responding to the foregoing Interrogatories.

INTERROGATORY NO. 33

Identify each individual who contributed to any answer to any preceding Interrogatory.

INTERROGATORY NO. 34

Identify all documents responsive to the foregoing Interrogatories that are lost, destroyed, or are otherwise no longer in the custody or control of Applicant.

Respectfully submitted,

Dated: May 17, 2018

/s/ Michele S. Katz
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S INTERROGATORIES TO APPLICANT is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: May 17, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 16

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

OPPOSER’S REQUESTS FOR ADMISSION TO APPLICANT

Pursuant to Fed. R. Civ. P. 26 and 36, and Trademark Rule of Practice 2.120, Opposer, Sjuklaedagerdin hf (“Opposer” or “Sjuklaedagerdin”), requests that Applicant, North 61, LLC (“Applicant” or “North 61”), respond in writing to the following Requests for Admission within thirty (30) days from the date of service or at such other time as counsel for the parties may agree.

DEFINITIONS AND INSTRUCTIONS

1. The Definitions and Instructions set forth in Opposer’s Interrogatories to Applicant, served simultaneously with these Requests for Admissions, are set forth as incorporated herein by reference.

2. The following Requests are continuing, and Applicant is reminded of its obligation for timely supplementation pursuant to Rule 26(e) of the Fed. R. Civ. P.

REQUESTS TO ADMIT

REQUEST NO. 1

Admit that Applicant’s website is located at www.north61.com (Applicant’s Website).

REQUEST NO. 2

Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “oberg trail hoodie” before filing the application on August 22, 2017.

REQUEST NO. 3

Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “classic short-sleeve t-shirt” before filing the application on August 22, 2017.

REQUEST NO. 4

Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “women’s tapered short-sleeve t-shirt” before filing the application on August 22, 2017.

REQUEST NO. 5

Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “kid’s short-sleeve t-shirt” before filing the application on August 22, 2017.

REQUEST NO. 6

Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “old school long sleeve t-shirt” before filing the application on August 22, 2017.

REQUEST NO. 7

Admit Applicant’s Website first began taking orders for items featured for sale to customers in the U.S. before August 22, 2017.

REQUEST NO. 8

Admit that Applicant was aware of Opposer and its products before the filing its Federal trademark application for NORTH 61 for its goods/services in Classes 16, 25 and 35 on August 22, 2017.

REQUEST NO. 9

Admit that Opposer’s marks 66°NORTH and/or 66°N (“Opposer’s Marks) were used in commerce prior to the filing date of Applicant’s intent to use U.S. trademark application.

REQUEST NO. 10

Admit that Opposer’s Marks were used in U.S. commerce prior to Applicant’s use of the NORTH

61 mark in use in commerce in the U.S.

REQUEST NO. 11

Admit that there was no ongoing sale of Applicant's business in association with Applicant's Mark at the time Patrick and Patricia Burns assigned the NORTH 61 mark to North 61, LLC.

REQUEST NO. 12

Admit that Applicant and Opposer market their goods and services to overlapping customers.

REQUEST NO. 13

Admit that Applicant and Opposer market their goods and services to overlapping classes of customers.

REQUEST NO. 14

Admit that Applicant and Opposer operate in at least some of the same channels of trade.

REQUEST NO. 15

Admit that Applicant's NORTH 61 mark and Opposer's Marks both contain the word "north" and a two (2) digit number both beginning with the number "6".

Respectfully submitted,

Dated: May 17, 2018

/s/ Michele S. Katz
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S REQUESTS FOR ADMISSIONS TO APPLICANT is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: May 17, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 17

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

**OPPOSER’S REQUESTS FOR PRODUCTION OF
DOCUMENTS AND THINGS TO APPLICANT**

Pursuant to Fed. R. Civ. P. 26 and 34, and Trademark Rule of Practice 2.120, Opposer Sjoklaedagerdin hf (“Opposer” or “Sjoklaedagerdin”), requests that Applicant, North 61, LLC (“Applicant” or “North 61”), produce within thirty (30) days the documents and things described by the following Requests at the offices of Advitam IP, 150 S. Wacker Drive, Suite 2400, Chicago, Illinois 60606, or at such other time and place as counsel for the parties may agree.

DEFINITIONS AND INSTRUCTIONS

1. The Definitions and Instructions set forth in Opposer’s Interrogatories to Applicant, served simultaneously with these Requests for Documents and Things, are set forth as incorporated herein by reference.

2. Any Document as to which a claim of privilege or immunity from discovery is or will be asserted by or on behalf of Applicant shall be identified by author, signatory, description (e. g., letter, memorandum, telex, recording, etc.), title (if any), date, addressee (if any), all other

recipients (if any), general subject matter, present depository, and present custodian. A complete statement of the grounds for the claim of privilege or immunity shall also be set forth.

3. If it is maintained that any requested Document has been destroyed, identify such Document, set forth the contents of the Document, state the date of such destruction, and identify the person(s) who authorized or directed such destruction.

4. If any requested Document cannot be produced in full, produce it to the extent possible, and state the reason(s) for Applicant's inability to produce the remainder.

5. The following Requests are continuing, and Applicant is reminded of its obligation for timely supplementation pursuant to Rule 26(e) of the Fed. R. Civ. P.

INDIVIDUAL REQUESTS

REQUEST NO. 1

All documents identified in response to any of the preceding Interrogatories.

REQUEST NO. 2

All documents that in any way support, were referenced, or which were used to prepare Applicant's answers to the preceding Interrogatories and Requests for Admission.

REQUEST NO. 3

Samples of all products Applicant has sold or intends to sell in connection with Applicant's Mark.

REQUEST NO. 4

All documents that refer, relate to, or identify the actual or intended market in the U.S. for Applicant's goods/services, including the class or type of actual or targeted customers for Applicant's goods/services.

REQUEST NO. 5

All documents that refer, relate to, or identify the actual or intended channels of trade in the U.S. that Applicant uses or through which it advertises, distributes, and/or sells Applicant's goods/services.

REQUEST NO. 6

A copy of any marketing plans for the U.S. that Applicant has utilized or intends to utilize in the U.S. for Applicant's goods/services.

REQUEST NO. 7

All documents relating to any survey, poll, or similar investigation conducted by or on behalf of Applicant relating to the actual or intended recognition of Opposer's Marks by the public or the trade.

REQUEST NO. 8

All documents that set forth, establish, or substantiate the date of first use anywhere and the date of first use in interstate commerce in the U.S. for Applicant's Mark on Applicant's goods/services.

REQUEST NO. 9

Representative documents and things relating to or consisting of any printed matter which contain or bear Applicant's Mark in any form, and including advertisements, labels, tags, packaging, promotional brochures, web sites, and the like, which have been or are currently used in connection with the sale, offering for sale, provision, advertising, distribution, or marketing of Applicant's goods/services in the U.S. from the date Applicant first began use of Applicant's Mark to the present. Please provide at least one document or thing for each month in each year in which use is claimed by Applicant and indicate the date of use of each document or thing.

REQUEST NO. 10

All documents and things relating to the discontinuance by Applicant for any period of time, the manufacture, sale, or distribution of any product or services bearing Applicant's Mark, from the claimed date of first use to the present.

REQUEST NO. 11

Each document that contains any reference to any conflict or potential conflict between Opposer's Mark and Applicant's Mark.

REQUEST NO. 12

Each document that contains any reference to a conflict or potential conflict between Applicant's Mark and any third party mark Applicant believes to be confusingly similar to Applicant's Mark.

REQUEST NO. 13

All correspondence between any advertising agencies and Applicant relating or referring to the promotion of Applicant's Mark in the U.S.

REQUEST NO. 14

All documents relating to surveys, market research, or competitive research done by or for Applicant and referring or relating to Applicant's Mark.

REQUEST NO. 15

All documents relating in any way to Applicant's Mark, including the date of and circumstances under which Applicant first became aware of Opposer's Marks.

REQUEST NO. 16

Copies of all letters and other communications published, sent to, and/or addressed to third parties by Applicant relating or referring to the subject matter of this proceeding.

REQUEST NO. 17

All documents referring or relating to any investigation, including any inquiry, survey, poll, credit check, or other type of investigation, Applicant has ever conducted or caused to be conducted involving:

- (a) Opposer's business; or
- (b) Opposer's Marks.

REQUEST NO. 18

All written agreements to which Applicant is or intends to be a party that relate to the acquisition of, and/or actual or intended use, promotion, and/or licensing of, Applicant's Mark in the U.S., including any modification of such agreements and all correspondence regarding or referring to such agreements and modifications thereto.

REQUEST NO. 19

All documents pertaining to any actual or intended license, assignment, or right granted by Applicant to a third party, or by a third party to Applicant, regarding Applicant's Mark.

REQUEST NO. 20

All trademark searches conducted by or on behalf of Applicant with regard to Applicant's Mark, including any documents relating to said searches that refer to the date each search was ordered, each database searched, each reference noted on each search, and the person who conducted the search.

REQUEST NO. 21

All documents relating or referring to any search or investigation, or other inquiry or disputes of any kind, relating to whether or not Applicant's Mark, or any colorable imitation thereof, have been or are being used or registered by others in the United States.

REQUEST NO. 22

All documents prepared by any present or former director, officer, manager, partner, agent, licensee, or employee of Applicant which refer to or in any manner mention Opposer's Marks.

REQUEST NO. 23

All documents prepared by any present or former director, officer, manager, partner, agent, licensee, or employee of Applicant which refer to or in any manner mention a third party's use of Applicant's Mark.

REQUEST NO. 24

All documents that refer or relate to the circumstances surrounding Applicant becoming aware of any third party's use of any mark Applicant believes to be confusingly similar to Applicant's Mark.

REQUEST NO. 25

All correspondence sent to Applicant from any individual or company not a party to these proceedings in which Applicant or Applicant's Mark and Opposer and/or Opposer's Marks are both referred to or mentioned.

REQUEST NO. 26

All correspondence sent to Applicant from any individual or company not a party to these proceedings which refers to or relates to a third party's use of a mark Applicant believes to be confusingly similar to Applicant's Mark.

REQUEST NO. 27

All letters, memoranda, notes, or other documents relating to any mail, telephone calls, or other communications that have been received by Applicant that were intended for Opposer and which involves Opposer's Marks.

REQUEST NO. 28

All documents relating or referring to the formation of North 61, LLC, including documents relating to the initial list of owners, officers, directors employees, agents, consultants, and attorneys.

REQUEST NO. 29

All U.S. customer and distributor lists for Applicant's goods/services offered under Applicant's Mark.

REQUEST NO. 30

A copy of representative sales documents, purchase orders, shipping documents, and any similar or related documents for each month from Applicant's date of first use of Applicant's Mark to the present, and for each of Applicant's goods/services with which the Applicant's Mark is currently used or with which Applicant's Mark was previously used, which show:

- (1) orders placed for Applicant's goods/services;
- (2) shipment made of Applicant's goods/services;
- (3) sales of Applicant's goods/services; and/or
- (4) the identity of the person or entity placing the order, the identity of the person or entity to whom the goods were shipped, and the identity of each person or entity to which a sale or shipment was made.

REQUEST NO. 31

All documents relating to the filing and prosecution of Application Serial No. 87/358942, including documents evidencing or relating to Applicant's bona fide intent to use the mark and documents evidencing the person or entity who had such intent.

REQUEST NO. 32

All documents and things which refer or relate to Applicant's past, current and intended future advertising and promotion of the designation NORTH 61.

REQUEST NO. 33

All documents relating to Opposition No. 91238542 filed with the Trademark Trial and Appeal Board including any cease and desist letter Applicant received and any resulting settlement agreement.

REQUEST NO. 34

All documents and things that refer to the sales, marketing, advertising or promotion of Applicant's goods/services offered or intended to be offered in connection with Applicant's Mark, including documents and things that refer to the current or proposed gross revenues, net revenues, and net profits Applicant derived or intends to derive from the sales of such goods/services.

REQUEST NO. 35

All documents and things which relate and/or refer to Applicant's creation, development, selection, adoption, decision to use and first use and intended first use of Applicant's Mark.

REQUEST NO. 36

All documents relating to or in any way discussing the marketing advantages and disadvantages arising from the use by Applicant of Applicant's Mark.

REQUEST NO. 37

All current and proposed advertising and promotional materials (draft or otherwise), regardless of the form of media, containing or referencing Applicant's Mark.

REQUEST NO. 38

All documents and things relating to the history and use of Applicant's Mark in connection with Applicant's goods/services.

REQUEST NO. 39

All documents and things relating to the Applicant's website analytics which demonstrates where visitors to its website are from.

REQUEST NO. 40

All other documents and things Applicant will rely on as evidence in the present proceeding that has not previously or hereinafter been requested.

Respectfully submitted,

Dated: May 17, 2018

/s/ Michele S. Katz _____
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO APPLICANT is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: May 17, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 18

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

SJOKLAEDAGERDIN HF,

Opposer,

v.

NORTH 61 LLC,

Applicant.

Opposition No. 91237366

Application Ser. No. 87/358942

Mark: **NORTH 61**

APPLICANT'S RESPONSES TO OPPOSER'S INTERROGATORIES TO APPLICANT

Pursuant to Rule 33, Fed. R. Civ. P., and Rules 2.116 and 2.120 of the Trademark Rules of Practice, Applicant provides the following answers to the first set of interrogatories, document requests, and admissions of Opposer. Applicant has used its best efforts to obtain the information subject to the following general and specific objections. Applicant reserves the right to supplement its responses.

GENERAL OBJECTIONS

1. These responses are limited to the information that is currently available to Applicant and documents, which have been located to date.
2. Applicant has not completed its investigation or preparation for the adjudication of this matter. Accordingly, these responses are made without prejudice to the right of Applicant to make further objections and present additional information which is hereafter discovered or which further discovery and investigation may indicate is relevant to this action and called for by this set of discovery requests.
3. Applicant objects to these interrogatories and discovery requests to the extent they seek information and documents that are subject to the attorney-client privilege, that evidence or

constitute attorney work product, that are the subject of confidentiality agreements with third parties, or that otherwise are not discoverable under the Federal Rules of Civil Procedure and the Trademark Rules of Practice.

2. Applicant objects to the discovery requests to the extent they are unduly burdensome and expansive, taking into account the needs of the case, the amount in controversy, the limitations of the parties' resources, and the importance of the issues at stake.

3. Applicant objects to the use of the words "all" or "any" or "each" in these interrogatories and discovery requests, insofar as they seek every fact, every instance, every event, or every person relating to the subject matter of the interrogatory. Literal compliance is impossible in most instances and, in others, imposes a burden and expense that outweighs any likely benefit. Applicant seeks to provide fair and accurate responses to the interrogatories, subject to any objections, in accordance with the Rules.

4. Applicant has responded to these discovery requests based upon its understanding of the requests, and to the best of its knowledge and recollection as of the date these responses are served. Applicant expressly reserves the right to provide supplemental responses should that become appropriate.

5. Applicant objects to these discovery requests to the extent they impose burdens and discovery obligations beyond those that are applicable under the Rules.

6. Applicant objects to the discovery requests to the extent that they seek information already known to Opposer or available to Opposer from documents in its own files or from public sources.

7. Applicant objects to providing any information that cannot reasonably be expected to lead to the discovery of admissible evidence. By providing any of the information

requested, Applicant does not concede the relevance thereof to the subject matter of this opposition proceeding.

8. Applicant objects to the extent the discovery requests call for information concerning Applicant's foreign use of the mark at issue in this case.

INTERROGATORIES

RESPONSES

INTERROGATORY NO. 1:

Identify and describe in detail each of Applicant's goods and services that Applicant currently promotes, sells, or provides in connection with those goods/services listed in connection with Applicant's Mark in the U.S. For each of the goods/services currently promoted, sold and provided, list representative dates of sale for each of Applicant's goods/services from the date of first use to the present, providing at least one such date for each month in which Applicant's goods/services were sold, and identify the exact product sold on each of such dates.

ANSWER:

Applicant objects to this Request as overly broad and unduly burdensome. To the extent not otherwise objected to, Applicant will provide only the information in its possession which is sufficient to meet the needs of this Request.

Applicant objects to this Request because the burden or expense to reasonably respond to this request outweighs its likely benefit.

To the extent not otherwise objected to, Applicant filed an intent-to-use application based on §1(b) of the Lanham Act. Applicant's current use of the mark is irrelevant for these purposes, and so are the dates of first use as they have not been asserted. Nevertheless, Applicant has used

the NORTH 61 mark in US commerce in connection with the following goods: Applicant first used the NORTH 61 mark in US commerce for clothing in September of 2017. Applicant first used the NORTH 61 mark in US commerce for printed items in May of 2017. Applicant first used the NORTH 61 mark in US commerce for retail services on [*clothing, sporting goods, leather bags*] in September of 2017.

INTERROGATORY NO. 2:

For each good/service not yet being used in interstate commerce in the U.S. please provide a detailed plan for when Applicant expects to use Applicant's mark in connection with such goods/services, including the marketing plan for when Applicant expects to launch each remaining good/service detailed in U.S. Application Serial No. 87/358942.

ANSWER:

Applicant objects to Opposer's use of the phrase "each" as overly broad and unduly burdensome. To the extent not otherwise objected to, Applicant will provide only the applicable information which is sufficient to meet the needs of the Request.

Applicant's plan to launch its extending product line includes sales at local shops in Minnesota, working on branding in conjunction with sponsorship of various events in the summer of 2018 such as the Lutsen 99er and Pedal to DC to Save the Boundary Waters, and various pop-up events in Minnesota.

INTERROGATORY NO. 3:

Identify all advertising agency, public relations, website design, and/or internet consulting firms used by Applicant in connection with the use, scheduled use, or planned use of Applicant's Mark, including the identity of those persons responsible for Applicant's account

with respect to the use, scheduled use, or planned use of Applicant's Mark and the dates each was engaged by Opposer.

ANSWER:

Applicant objects to Opposer's use of the phrase "all" as overly broad and unduly burdensome. To the extent not otherwise objected to, Applicant will provide only the applicable information which is sufficient to meet the needs of the Request.

To the extent not otherwise objected to, Applicant has worked with Minnesota company Just Jewett in creating and maintaining its website.

INTERROGATORY NO. 4:

Identify all persons who now have or previously had any knowledge or responsibility, directly or indirectly, for or relating to any applications, assignments, or other documents filed with the United States Patent and Trademark Office, or any state agency or office, involving Applicant's Mark.

ANSWER:

Applicant objects to Opposer's use of the phrase "all" as overly broad and unduly burdensome. Applicant further objects to the term "directly or indirectly" as vague and not subject to a precise response. To the extent not otherwise objected to, Applicant will provide only the applicable information which is sufficient to meet the needs of the Request.

Applicant identifies Patrick Burns and Paula Burns.

INTERROGATORY NO. 5:

Identify representative samples of printed matter, including advertisements, labels, tags, packaging, promotional brochures, web sites, and the like, which contain or bear Applicant's Mark in any form, and which have been or are currently used in connection with the sale,

offering for sale, provision, advertising, distribution or marketing of Applicant's goods/services in the U.S. from the date Applicant first began use of Applicant's Mark to the present. Please provide a sample for each month in each year in which use is claimed by Applicant and identify for each sample the date on which it was used.

ANSWER:

Applicant objects to Opposer's use of the phrase "Mark in any form" as overly broad and unduly burdensome. Applicant further objects to this Request as any information pertaining to other mark forms, aside from Applicant's Mark at issue, is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide a representative sample of the requested printed materials which are sufficient to meet the needs of the Request.

INTERROGATORY NO. 6:

For Applicant's goods/services, identify the individuals who are responsible for or most knowledgeable of Applicant's:

- (a) advertising and promotion of Applicant's goods/services in the U.S.;
- (b) searching and clearance of Applicant's Mark in the U.S.;
- (c) manufacture, sale, distribution, or provision of the Applicant's goods/services in the U.S.;
- (d) trade channels through which Applicant's goods/services are, have been and will be sold in the U.S.; and
- (e) target customers for Applicant's goods/services.

Identify these individuals for each month and year from Applicant's date of first use to

ANSWER:

Applicant objects to this Request as vague and not subject to a precise response so far as the request for “who are responsible for?” To the extent not otherwise objected to, Applicant identifies Paula Burns and Patrick Burns.

INTERROGATORY NO. 7:

Describe any instances of actual confusion, mistake, deception, or false association between Applicant’s Mark and Opposer’s Mark. For illustrative purposes only, and without limiting the foregoing, such instances would include misdirected mail, e-mail messages, telephone calls, inquiries, requests for information, or customer comments or complaints.

ANSWER: Applicant is not aware of any instances of actual confusion, mistake, deception, or false association between Applicant’s Mark and Opposer’s Mark.

INTERROGATORY NO. 8:

Describe all instances in which Applicant has objected to the use, registration, or application for registration of any third party of any mark it believed to be confusingly similar to Applicant’s Mark and explain in detail the resolution of each such matter, identify each third party and mark, and identify all documents related thereto.

ANSWER: Applicant has not objected to any use, registration, or application for registration of any third party of any mark it believed to be confusingly similar to Applicant’s Mark.

INTERROGATORY NO. 9:

Describe all instances in which Applicant’s use, or application to register Applicant’s Mark or any similar mark has been the subject of (1) a refusal to register by the U.S. Trademark Office

and/or (2) an objection of any kind by a third party and explain in detail the resolution of each such matter, and identify all documents related thereto.

ANSWER:

Applicant objects to Opposer's use of the phrase "all instances" as overly broad and unduly burdensome. Applicant further objects to this Request as asking for any information not relevant to this proceeding. To the extent not otherwise objected to, Applicant identifies Opposition No. 91238542 filed by Askov Holdings, LLC. All relevant documents are publicly available via ttabvue.com. On March 23, 2018, Opposer filed a withdrawal of the opposition, with Applicant's written consent. The Board dismissed the opposition without prejudice, and there is no formal, written agreement between the parties to disclose.

INTERROGATORY NO. 10:

Identify all parties to any agreements or understandings relating to the sale or distribution of Applicant's goods/services in the U.S., including, without limitation, all license agreements.

ANSWER: Applicant objects to Opposer's use of the phrase "all parties to any agreements" as overly broad and unduly burdensome. Applicant further objects to this Request as asking for any information not relevant to this proceeding. To the extent not otherwise objected to, Applicant states that it has an understanding with Askov Holdings, LLC that it will not use NORTH 61 with the term "North" appearing as the primary or dominant element of its mark, and that it will not use "NORTH" or "NORTH 61" on knit hats with pom-poms.

INTERROGATORY NO. 11:

- (a) Identify any agreements or understandings constituting or relating to the settlement or resolution, or attempted settlement or resolution, of any controversy concerning Applicant's Mark; and

(b) Identify all the parties to such understandings or agreements.

ANSWER: Applicant objects to Opposer's use of the phrase "any agreements" as overly broad and unduly burdensome. Applicant further objects to this Request as asking for information not relevant to this proceeding. Applicant objects to this request as it has already been answered and asks for repetitive information.

INTERROGATORY NO. 12:

With the exception of this proceeding, identify each civil action or administrative proceeding in the United States or elsewhere in which Applicant is now or has ever been a party and that has involved Applicant's Mark.

ANSWER: Applicant objects to Opposer's use of the phrase " each civil action or administrative proceeding" as overly broad and unduly burdensome. Applicant further objects to this Request as asking for any information not relevant to this proceeding. Applicant objects to this request as it has already been answered and asks for repetitive information.

INTERROGATORY NO. 13:

Identify all studies that refer or relate to the proposed or actual sale, marketing, provision, or advertising of Applicant's goods/services in the U.S., including, without limitation, all advertising studies, consumer studies, and market research studies.

ANSWER: Applicant states that there are no relevant studies.

INTERROGATORY NO. 14:

State the date and the circumstances under which Applicant first became aware of Opposer's Mark.

ANSWER: Applicant first became aware of Opposer's Mark on September 20, 2017, when Opposer filed its First 30 Day Request for an Extension of Time to Oppose.

INTERROGATORY NO. 15:

Identify each investigation of Opposer and/or Opposer's Marks conducted by or on behalf of Applicant, the date of each investigation, the individual conducting each investigation, and the results of each investigation.

ANSWER: Applicant submits that there have been no formal investigations of Opposer or Opposer's Marks aside from conducting an Internet Search of Opposer when Opposer filed its First 30 Day Request for an Extension of Time to Oppose. In that search, Applicant found Opposer's website at www.66north.com. From that search, Applicant learned that Opposer sold clothing on its website in Euros and its contact address was Midhraun 11, 210 Gardabae, Iceland. Nothing on Opposer's website suggested Opposer sold its clothing in the United States.

INTERROGATORY NO. 16:

Identify each search conducted by Applicant at any time for Applicant's Mark or for any mark containing any form of the words "NORTH" and specifically in which classes Applicant conducted the search and the results of the search and whether the search uncovered Opposer's Marks.

ANSWER:

Applicant objects to this Request as overly broad and unduly burdensome. To the extent not otherwise objected to, Applicant conducted a search on the USPTO website (i.e. TESS) and on the Internet for the mark NORTH 61, and that search revealed no relevant references. Applicant also conducted a search of the term NORTH on TESS in classes 16, 25 and 35. Applicant cannot recall its exact results, but recalls there were about 500 live, pending/registered marks in class 25 comprised of the term NORTH, about 300 live, pending/registered marks in class 16 comprised

of the term NORTH, and at least 200 live, pending/registered marks comprised of the term NORTH in class 35 for retail services.

INTERROGATORY NO. 17:

Identify all third parties of which Applicant is aware who use a mark Applicant believes to be confusingly similar to Applicant's Mark.

ANSWER: Applicant is unaware of any third parties that has a confusingly similar mark.

INTERROGATORY NO. 18:

Identify Applicant's current advertising and promotion expenditures by month since use began in connection with Applicant's goods/services in the U.S. and provide expected yearly advertising and promotion expenditures (by month) over the next five (5) years for those goods/services identifies in connection with Applicant's Mark.

ANSWER: Applicant objects to this Request as overly broad and unduly burdensome. To the extent not otherwise objected to, Applicant identifies past expenditures for marketing that include sponsorships of events listed above, print advertising in Lake Time Magazine and Northern Wilds Magazine, and in-kind sponsorships and advertising through local events such as Unique, Rummage, Save the Boundary Waters and other pop-up sales events.

INTERROGATORY NO. 19:

Identify Applicant's current advertising and promotion expenditures by month since use began in connection with Applicant's goods/services in the U.S. and provide expected yearly advertising and promotion expenditures (by month) over the next five (5) years for those goods/services identifies in connection with Applicant's Mark.

ANSWER: Applicant objects to this Request as overly broad and unduly burdensome. Applicant objects to this request as irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Applicant further objects to this request as it calls for information already requested.

INTERROGATORY NO. 20:

Identify with specificity all goods/services Applicant intends to market in connection with Applicant's Mark in the next three years that are not listed in U.S. Application Serial No. 87/358942.

ANSWER: Applicant objects to this Request as overly broad and unduly burdensome as it calls for "all goods/services." Applicant further objects to this Request as irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant identifies on-going expansion of its product line to include variations on clothing, printed material, novelty items and other American made goods.

INTERROGATORY NO. 21:

Identify with specificity how Applicant acquires its customers and its customers acquisition cost.

ANSWER: Applicant objects to this Request as calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 22:

Describe Applicant's target customer and provide its marketing plan for the next three years.

ANSWER:

Applicant objects to this Request as calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 23:

Describe Applicant's average purchase in dollars, by month since Applicant first launched its website and began selling product on Applicant's website.

ANSWER:

Applicant objects to this Request as calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 24:

If Applicant has in-store distribution, identify with specificity a complete list of all of the stores and distributors that currently carry or that Applicant is in talks to carry Applicant's products including the names and addresses of such outlets.

ANSWER:

Applicant objects to this Request as calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce

representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 25:

If Applicant promotes its products at tradeshow, identify with specificity each and every tradeshow that Applicant has displayed its products or intends to display its products in the next three (3) years, including the name of the tradeshow, when it occurs and where it is located.

ANSWER:

Applicant objects to this Request as calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 26:

Identify with specificity how Applicant came up with its mark NORTH 61, what the inspiration was for its name, and what the name means to Applicant.

ANSWER: Applicant was inspired by the North Shore of Minnesota when it coined the NORTH 61 Mark.

INTERROGATORY NO. 27:

Describe whether Applicant has any plans in the next five (5) years to expand internationally and if so, please identify with specificity which countries it intends to expand to.

ANSWER:

Applicant objects to this Request as calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce

representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 28:

Identify the name of the proper owner(s) who had the control over Applicant's mark in interstate commerce in the U.S. or intended use in interstate commerce in the U.S. at the time Application Serial No. 87/358942 was filed on August 22, 2017 and provide all related documents thereto.

ANSWER: Patrick and Paula Burns had the control over Applicant's mark in interstate commerce in the U.S. or intended use in interstate commerce in the U.S. at the time Application Serial No. 87/358942 was filed on August 22, 2017. Patrick and Paula Burns later established North 61 LLC wherein they assigned all business assets and all goodwill into North 61 LLC.

INTERROGATORY NO. 29:

Identify in detail the ongoing business that was sold from Patrick and Patricia Burns to North 61, LLC on June 24, 2017 and provide all documents detailing the asset purchase agreement or other documentation detailing the sale.

ANSWER:

Applicant objects to this Request as calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 30:

Identify the date that North 61, LLC was incorporated and provide all documents related thereto.

ANSWER: The original filing date of North 61 LLC with the Minnesota Secretary of State was April 23, 2017. Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 31:

Identify the geographic breakdown of Applicant's website visitors by country since Applicant's website launched.

ANSWER:

Applicant objects to this Request as being irrelevant and calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 32:

Identify each document upon which Applicant has relied in responding to the foregoing Interrogatories.

ANSWER:

Applicant objects to this Request as calling for the production of confidential and proprietary information. To the extent not otherwise objected to, Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place to respond to this inquiry.

INTERROGATORY NO. 33:

Identify each individual who contributed to any answer to any preceding Interrogatory.

ANSWER: Applicant identifies Patrick and Paula Burns.

INTERROGATORY NO. 34:

Identify all documents responsive to the foregoing Interrogatories that are lost, destroyed, or are otherwise no longer in the custody or control of Applicant.

ANSWER: Applicant submits that there are no such documents.

Date: June 10, 2018

/s/ Patrick R. Burns
Patrick R. Burns
Burns Law Firm PLLC
1624 Harmon Place, Ste 300
Minneapolis, MN 55403
patrick@burns-law.mn

VERIFICATION OF INTERROGATORY ANSWERS

The undersigned verifies, based on reasonable inquiry, that all statements made of their own knowledge are true, and all statements made on information and belief are believed to be true.

I verify under penalty of perjury that the foregoing is true and correct.

NORTH 61 LLC

Dated: June 10, 2018

By: /s/ Patrick R. Burns

Title: co-founder

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing APPLICANT'S RESPONSES TO OPPOSER'S INTERROGATORIES TO APPLICANT have been served via email, this ____ day of June, 2018 as follows:

MICHELE S KATZ
ADVITAM IP LLC
150 N WACKER DRIVE, SUITE 2400
CHICAGO, IL 60606
mskdocket@advitamip.com , atokarz@advitamip.com,
mkatz@advitamip.com

Date: June 10, 2018

/s/Patrick R. Burns
Patrick R. Burns

EXHIBIT 19

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

SJOKLAEDAGERDIN HF,

Opposer,

v.

NORTH 61 LLC,

Applicant.

Opposition No. 91237366

Application Ser. No. 87/358942

Mark: **NORTH 61**

**APPLICANT’S RESPONSES TO OPPOSER’S REQUESTS FOR ADMISSIONS TO
APPLICANT**

Applicant North 61 LLC (“Applicant”) hereby responds, pursuant to Rule 33 of the Federal Rules of Civil Procedure, to Opposer’s Requests for Admissions to Applicant as follows:

RESPONSES

REQUEST FOR ADMISSION NO. 1: Admit that Applicant’s website is located at www.north61.com (Applicant’s Website).

RESPONSE: Admitted.

REQUEST FOR ADMISSION NO. 2: Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “oberg trail hoodie” before filing the application on August 22, 2017.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 3: Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “classic short-sleeve t-shirt” before filing the application on August 22, 2017.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 4: Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “women’s tapered short-sleeve t-shirt” before filing the application on August 22, 2017.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 5: Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “kid’s short-sleeve t-shirt” before filing the application on August 22, 2017.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 6: Admit that Applicant started using the mark NORTH 61 in interstate commerce in the U.S. on the clothing item “old school long sleeve t-shirt” before filing the application on August 22, 2017.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 7: Admit Applicant’s Website first began taking orders for items featured for sale to customers in the U.S. before August 22, 2017.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 8: Admit that Applicant was aware of Opposer and its products before the filing its Federal trademark application for NORTH 61 for its goods/services in Classes 16, 25 and 35 on August 22, 2017.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 9: Admit that Opposer’s marks 66°NORTH and/or 66°N (“Opposer’s Marks) were used in commerce prior to the filing date of Applicant’s intent to use U.S. trademark application.

RESPONSE: Denied. Applicant cannot truthfully admit this request as it does not know when Opposer used Opposer's Marks in commerce.

REQUEST FOR ADMISSION NO. 10: Admit that Opposer's Marks were used in U.S. commerce prior to Applicant's use of the NORTH 61 mark in use in commerce in the U.S.

RESPONSE: Denied. Applicant cannot truthfully admit this request as it does not know when Opposer used Opposer's Marks in U.S. commerce.

REQUEST FOR ADMISSION NO. 11: Admit that there was no ongoing sale of Applicant's business in association with Applicant's Mark at the time Patrick and Patricia Burns assigned the NORTH 61 mark to North 61, LLC.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 12: Admit that Applicant and Opposer market their goods and services to overlapping customers.

RESPONSE: Denied. Applicant cannot truthfully admit this request as it does not know whether Opposer markets its goods and services to overlapping customers.

REQUEST FOR ADMISSION NO. 13: Admit that Applicant and Opposer market their goods and services to overlapping classes of customers.

RESPONSE: Denied. Applicant cannot truthfully admit this request as it does not know whether Opposer markets its goods and services to overlapping classes of customers.

REQUEST FOR ADMISSION NO. 14: Admit that Applicant and Opposer operate in at least some of the same channels of trade.

RESPONSE: Denied. Applicant cannot truthfully admit this request as it does not know whether Opposer operates in at least some of the same channels of trade.

REQUEST FOR ADMISSION NO. 15: Admit that Applicant's NORTH 61 mark and Opposer's Marks both contain the word "north" and a two (2) digit number both beginning with the number "6".

RESPONSE: Denied. U.S. Reg. Nos. 5075773 and 1390872 do not contain the word "north."

Date: June 10, 2018

/s/ Patrick R. Burns
Patrick R. Burns
Burns Law Firm PLLC
1624 Harmon Place, Ste 300
Minneapolis, MN 55403
patrick@burns-law.mn

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing RESPONSES TO OPPOSER'S REQUESTS FOR ADMISSIONS TO APPLICANT have been served via email, this 10th day of June, 2018 as follows:

MICHELE S KATZ
ADVITAM IP LLC
150 N WACKER DRIVE, SUITE 2400
CHICAGO, IL 60606
mskdocket@advitamip.com , atokarz@advitamip.com,
mkatz@advitamip.com

Date: June 10, 2018

/s/ Patrick R. Burns
Patrick R. Burns

EXHIBIT 20

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

SJOKLAEDAGERDIN HF,

Opposer,

v.

NORTH 61 LLC,

Applicant.

Opposition No. 91237366

Application Ser. No. 87/358942

Mark: **NORTH 61**

**APPLICANT'S RESPONSES TO OPPOSER'S REQUESTS FOR PRODUCTION OF
DOCUMENTS AND THINGS**

RESPONSES

REQUEST NO. 1

All documents identified in response to any of the preceding Interrogatories.

ANSWER NO. 1:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 2

All documents that in any way support, were referenced, or which were used to prepare Applicant's answers to the preceding Interrogatories and Requests for Admission.

ANSWER NO. 2:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 3

Samples of all products Applicant has sold or intends to sell in connection with Applicant's Mark.

ANSWER NO. 3:

Applicant objects to Opposer's use of the phrase "all products" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 4

All documents that refer, relate to, or identify the actual or intended market in the U.S. for Applicant's goods/services, including the class or type of actual or targeted customers for Applicant's goods/services.

ANSWER NO. 4:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is

irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 5

All documents that refer, relate to, or identify the actual or intended channels of trade in the U.S. that Applicant uses or through which it advertises, distributes, and/or sells Applicant's goods/services.

ANSWER NO. 5:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 6

A copy of any marketing plans for the U.S. that Applicant has utilized or intends to utilize in the U.S. for Applicant's goods/services.

ANSWER NO. 6:

Applicant objects to this Request as calling for the production of confidential and proprietary information. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to,

Applicant will produce representative, responsive, confidential documents subject to the protective order currently in place.

REQUEST NO. 7

All documents relating to any survey, poll, or similar investigation conducted by or on behalf of Applicant relating to the actual or intended recognition of Opposer's Marks by the public or the trade.

ANSWER NO. 7:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 8

All documents that set forth, establish, or substantiate the date of first use anywhere and the date of first use in interstate commerce in the U.S. for Applicant's Mark on Applicant's goods/services.

ANSWER NO. 8:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to,

Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 9

Representative documents and things relating to or consisting of any printed matter which contain or bear Applicant's Mark in any form, and including advertisements, labels, tags, packaging, promotional brochures, web sites, and the like, which have been or are currently used in connection with the sale, offering for sale, provision, advertising, distribution, or marketing of Applicant's goods/services in the U.S. from the date Applicant first began use of Applicant's Mark to the present. Please provide at least one document or thing for each month in each year in which use is claimed by Applicant and indicate the date of use of each document or thing.

ANSWER NO. 9:

Applicant objects to Opposer's use of the phrase "any printed matter" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 10

All documents and things relating to the discontinuance by Applicant for any period of time, the manufacture, sale, or distribution of any product or services bearing Applicant's Mark, from the claimed date of first use to the present.

ANSWER NO. 10:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 11

Each document that contains any reference to any conflict or potential conflict between Opposer's Mark and Applicant's Mark

ANSWER NO. 11:

Applicant objects to Opposer's use of the phrase "each document" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 12

Each document that contains any reference to a conflict or potential conflict between Applicant's Mark and any third party mark Applicant believes to be confusingly similar to Applicant's Mark.

ANSWER NO. 12:

Applicant objects to Opposer's use of the phrase "each document" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 13

All correspondence between any advertising agencies and Applicant relating or referring to the promotion of Applicant's Mark in the U.S.

ANSWER NO. 13:

Applicant objects to Opposer's use of the phrase "all correspondence" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 14

All documents relating to surveys, market research, or competitive research done by or for Applicant and referring or relating to Applicant's Mark.

ANSWER NO. 14:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated

to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 15

All documents relating in any way to Applicant's Mark, including the date of and circumstances under which Applicant first became aware of Opposer's Marks.

ANSWER NO. 15:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 16

Copies of all letters and other communications published, sent to, and/or addressed to third parties by Applicant relating or referring to the subject matter of this proceeding.

ANSWER NO. 16:

Applicant objects to Opposer's use of the phrase "copies of all letters and other communications published" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 17

All documents referring or relating to any investigation, including any inquiry, survey, poll, credit check, or other type of investigation, Applicant has ever conducted or caused to be conducted involving:

- (a) Opposer's business; or
- (b) Opposer's Marks.

ANSWER NO. 17:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 18

All written agreements to which Applicant is or intends to be a party that relate to the acquisition of, and/or actual or intended use, promotion, and/or licensing of, Applicant's Mark in the U.S., including any modification of such agreements and all correspondence regarding or referring to such agreements and modifications thereto.

ANSWER NO. 18:

Applicant objects to Opposer's use of the phrase "all written agreements" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated

to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 19

All documents pertaining to any actual or intended license, assignment, or right granted by Applicant to a third party, or by a third party to Applicant, regarding Applicant's Mark.

ANSWER NO. 19:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 20

All trademark searches conducted by or on behalf of Applicant with regard to Applicant's Mark, including any documents relating to said searches that refer to the date each search was ordered, each database searched, each reference noted on each search, and the person who conducted the search.

ANSWER NO. 20:

Applicant objects to Opposer's use of the phrase "all trademark searches" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to,

Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 21

All documents relating or referring to any search or investigation, or other inquiry or disputes of any kind, relating to whether or not Applicant's Mark, or any colorable imitation thereof, have been or are being used or registered by others in the United States.

ANSWER NO. 21:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 22

All documents prepared by any present or former director, officer, manager, partner, agent, licensee, or employee of Applicant which refer to or in any manner mention Opposer's Marks.

ANSWER NO. 22:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 23

All documents prepared by any present or former director, officer, manager, partner, agent, licensee, or employee of Applicant which refer to or in any manner mention a third party's use of Applicant's Mark.

ANSWER NO. 23:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 24:

All documents that refer or relate to the circumstances surrounding Applicant becoming aware of any third party's use of any mark Applicant believes to be confusingly similar to Applicant's Mark.

ANSWER NO. 24:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 25

All correspondence sent to Applicant from any individual or company not a party to these proceedings in which Applicant or Applicant's Mark and Opposer and/or Opposer's Marks are both referred to or mentioned.

ANSWER NO. 25:

Applicant objects to Opposer's use of the phrase "all correspondence" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 26

All correspondence sent to Applicant from any individual or company not a party to these proceedings which refers to or relates to a third party's use of a mark Applicant believes to be confusingly similar to Applicant's Mark.

ANSWER NO. 26:

Applicant objects to Opposer's use of the phrase "all correspondence" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 27

All letters, memoranda, notes, or other documents relating to any mail, telephone calls, or other communications that have been received by Applicant that were intended for Opposer and which involves Opposer's Marks.

ANSWER NO. 27:

Applicant objects to Opposer's use of the phrase "all letters, memoranda, notes, or other documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 28

All documents relating or referring to the formation of North 61, LLC, including documents relating to the initial list of owners, officers, directors employees, agents, consultants, and attorneys.

ANSWER NO. 28:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 29

All U.S. customer and distributor lists for Applicant's goods/services offered under Applicant's Mark.

ANSWER NO. 29:

Applicant objects to Opposer's use of the phrase " U.S. customer and distributor lists" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 30

A copy of representative sales documents, purchase orders, shipping documents, and any similar or related documents for each month from Applicant's date of first use of Applicant's Mark to the present, and for each of Applicant's goods/services with which the Applicant's Mark is currently used or with which Applicant's Mark was previously used, which show:

- (1) orders placed for Applicant's goods/services;
- (2) shipment made of Applicant's goods/services;
- (3) sales of Applicant's goods/services; and/or
- (4) the identity of the person or entity placing the order, the identity of the person or entity to whom the goods were shipped, and the identity of each person or entity to which a sale or shipment was made.

ANSWER NO. 30:

Applicant objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 31

All documents relating to the filing and prosecution of Application Serial No. 87/358942, including documents evidencing or relating to Applicant's bona fide intent to use the mark and documents evidencing the person or entity who had such intent.

ANSWER NO. 31:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 32

All documents and things which refer or relate to Applicant's past, current and intended future advertising and promotion of the designation NORTH 61.

ANSWER NO. 32:

Applicant objects to Opposer's use of the phrase "all documents and things" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably

calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 33

All documents relating to Opposition No. 91238542 filed with the Trademark Trial and Appeal Board including any cease and desist letter Applicant received and any resulting settlement agreement.

ANSWER NO. 33:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 34

All documents and things that refer to the sales, marketing, advertising or promotion of Applicant's goods/services offered or intended to be offered in connection with Applicant's Mark, including documents and things that refer to the current or proposed gross revenues, net revenues, and net profits Applicant derived or intends to derive from the sales of such goods/services.

ANSWER NO. 34:

Applicant objects to Opposer's use of the phrase "all documents and things" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably

calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 35

All documents and things which relate and/or refer to Applicant's creation, development, selection, adoption, decision to use and first use and intended first use of Applicant's Mark.

ANSWER NO. 35:

Applicant objects to Opposer's use of the phrase "all documents and things" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 36

All documents relating to or in any way discussing the marketing advantages and disadvantages arising from the use by Applicant of Applicant's Mark.

ANSWER NO. 36:

Applicant objects to Opposer's use of the phrase "all documents" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 37

All current and proposed advertising and promotional materials (draft or otherwise), regardless of the form of media, containing or referencing Applicant's Mark.

ANSWER NO. 37:

Applicant objects to Opposer's use of the phrase "all current and proposed" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 38

All documents and things relating to the history and use of Applicant's Mark in connection with Applicant's goods/services.

ANSWER NO. 38

Applicant objects to Opposer's use of the phrase "all documents and things" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 39

All documents and things relating to the Applicant's website analytics which demonstrates where visitors to its website are from.

ANSWER NO. 39

Applicant objects to Opposer's use of the phrase "all documents and things" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

REQUEST NO. 40

All other documents and things Applicant will rely on as evidence in the present proceeding that has not previously or hereinafter been requested.

ANSWER NO. 40

Applicant objects to Opposer's use of the phrase "all documents and things" as overly broad and unduly burdensome. Applicant further objects to this request as it calls for information that is irrelevant to the subject matter involved in the pending proceeding and not reasonably calculated to lead to the discovery of admissible evidence. To the extent not otherwise objected to, Applicant will provide only those documents which are sufficient to meet the needs of the Request.

Date: June 10, 2018

 /s/Patrick R. Burns
Patrick R. Burns
Burns Law Firm PLLC
1624 Harmon Place, Ste 300
Minneapolis, MN 55403
patrick@burns-law.mn

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing APPLICANT'S RESPONSES TO OPPOSER'S REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS have been served via email, this 10th day of June, 2018 as follows:

MICHELE S KATZ
ADVITAM IP LLC
150 N WACKER DRIVE, SUITE 2400
CHICAGO, IL 60606
mskdocket@advitamip.com , atokarz@advitamip.com,
mkatz@advitamip.com

Date: June 10, 2018

/s/ Patrick R. Burns
Patrick R. Burns

EXHIBIT 21

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

**OPPOSER’S SUPPLEMENTAL RESPONSE TO APPLICANT’S
FIRST SET OF INTERROGATORIES**

Pursuant to Rule 33, Fed. R. Civ. P., and Rules 2.116 and 2.120 of the Trademark Rules of Practice, Opposer hereby supplements its answers to the first set of interrogatories of Applicant served on May 10, 2018. Opposer has used its best efforts to obtain the information subject to the following general and specific objections. Opposer reserves the right to further supplement its responses.

GENERAL OBJECTIONS

1. These responses are limited to the information that is currently available to Opposer and documents, which have been located to date.

2. Opposer has not completed its investigation or preparation for the adjudication of this matter. Accordingly, these responses are made without prejudice to the right of Opposer to make further objections and present additional information which is hereafter discovered or which further discovery and investigation may indicate is relevant to this action and called for by this set of document requests.

3. These general objections are applicable to each and every one of the following responses and objections, and failure to repeat an objection to a specific document request shall not be deemed a waiver of such an objection. Furthermore, when Opposer specifically repeats one or more of these general objections in response to a specific document request, such a specific response shall not be deemed a waiver of these general objections. Finally, when a response references Opposer's response to another request, the reference should be deemed to include both the other response and the objections raised in the other response.

4. Opposer reserves all rights to object as to the competency, relevancy, materiality, and admissibility of the responses to these document requests.

5. Opposer reserves all rights to object on any ground to the use of any of these responses to these documents requests in any subsequent proceeding including the adjudication of this or any other action.

6. Opposer objects to Applicant's requests, definitions and instructions to the extent that Applicant seeks to impose on Opposer obligations beyond those of the Federal Rules of Civil Procedure, the Trademark Trial and Appeal Board Rules, applicable orders or decisions in this proceeding, or any stipulation or agreement of the parties to this proceeding.

7. Opposer objects to Applicant's requests, definitions and instructions to the extent that they are vague and ambiguous.

8. To the extent that any of these document requests include material covered by the attorney-client privilege or work-product doctrine, they are objected to.

9. Opposer objects to these document requests to the extent they seek proprietary or confidential business information. Opposer will produce such relevant information only pursuant to the Stipulated Protective Order entered into in this case.

10. Opposer objects generally to the definitions set forth in Applicant's Interrogatories. Opposer's responses to Applicant's requests do not constitute representations or admissions that Opposer agrees or adopts any of Applicant's definitions. The Specific Responses set forth below are based on Opposer's interpretation of the language used in Applicant's requests, and Opposer reserves its right to amend or supplement its responses should Applicant assert an interpretation that differs from Opposer's interpretation.

11. Opposer objects to Applicant's use of phrases such as "all documents and things concerning" and the like as overly broad and unduly burdensome to the extent that they encompass, *inter alia*, chance references to potentially responsive subject matter in documents that would not reasonably be expected to contain such references and would require an unreasonably detailed and extensive search of all of Opposer's documents and files to locate.

12. Opposer objects to Applicant's requests to the extent that they seek expert discovery on the grounds that they are premature.

INTERROGATORIES

1. Identify each person having knowledge about the clearance, selection and adoption of Opposer's mark.

ANSWER: Opposer is still investigating and reserves the right to supplement answer.

SUPPLEMENTAL ANSWER: The following individuals are likely to have knowledge about the clearance, selection and adoption of the Opposer's marks.

- (a) Bjarney Hardardottir
- (b) Fannar Pall Aoalsteinsson
- (c) Hermann Sigursteinsson
- (d) Rosa Tryggvadottir

Opposer is still investigating other personnel, individuals, and/or related entities that may have relevant discoverable information and reserves the right to supplement answer. See Opposer's Initial Disclosures.

2. Identify the Person having the greatest knowledge about advertising, promotion and use or intended use of Opposer's mark in the United States.

ANSWER: Helgi Rúnar Óskarsson, CEO and Bjarney Hardardóttir Head of Business Development.

3. Specify the date when Opposer first adopted or intended to use Opposer's mark, and when Opposer first used the designation "66°NORTH" or "66°N" on Opposer's goods/services in the United States.

ANSWER: At least as early as 2006. Opposer is still investigating and reserves the right to supplement answer.

4. Identify and describe each and every good or service in connection with which Opposer has used Opposer's mark.

ANSWER: Opposer objects to this interrogatory as unduly burdensome and overly broad. In addition, opposer objects to this interrogatory on relevancy grounds as the Board can only rule on issues of registrability and not use.

5. Specify the date of first use in commerce in the United States of Opposer's mark in connection with each good or service to be identified in response to Interrogatory No. 4, the manner of such use or intended use, the geographic territory to which such use has occurred or is intended to occur, and the types or classes of customers who were exposed to such use, and identify all Documents referring or relating to such first use.

ANSWER: Opposer objects to this interrogatory as unduly burdensome and overly broad. In addition, opposer objects to this interrogatory on relevancy grounds as the Board can only rule on issues of registrability and not use.

6. Describe with specificity how Opposer created the "66°NORTH" or "66°N" mark and why 66°NORTH/66°N was the brand name chosen as the trademark for Opposer's goods and services.

ANSWER: According to Opposer's website at <https://www.66north.com/us/about-us/our-heritage/>, 66°North was founded in 1926 by Hans Kristjánsson with the purpose of making protective clothing for Icelandic fishermen and workers braving the North Atlantic elements. Hans Kristjánsson lived in Suðureyri in Ségandafjörður in Westfjords of Iceland where weather conditions were very harsh and right clothing was therefore a matter of life and death for Icelandic fishermen.

Hans was passionate about creating garments that would hold up to the harsh conditions fishermen faced while trolling the seas of Iceland so he moved to Norway to learn how to tailor and sew fishermen's clothing. When Hans moved back to Suðureyri he founded Sjóklæðagerð Íslands now better known as 66°North. 66°North derives its name from the latitudinal line of the Arctic Circle which touches Ségandafjörður where the company was founded in 1926.

7. Specify the channels of trade currently used or intended to be used by Opposer for marketing, promoting and selling Opposer's goods or services on or in connection with Opposer's mark.

ANSWER: Opposer's products are sold in Moosejaw stores <https://www.moosejaw.com/moosejaw/shop/home>.

8. Specify all actions taken by Opposer that supports Opposer's intent to all of Opposer's marks listed in No. 7 of the *Definitions & Instructions* Section in the U.S. in connection with the goods and services in classes 6, 8, 9, 18, 20, 21,22, 24, 25, 28, 35 and 41.

ANSWER: Opposer objects to this interrogatory as unduly burdensome and overly broad. In addition, opposer objects to this interrogatory on relevancy grounds as applicant's application only covers goods/services in Classes 16, 25 and 35.

9. Identify each person and agency that has participated in the creation, advertising and/or promotion of Opposer's mark, and the period of time during which each person or agency has participated.

ANSWER: Opposer objects to this interrogatory as unduly burdensome and overly broad as Opposer has been in business globally since 1926. Opposer has recently used J&L agency, based in Iceland. <http://www.jl.is/>

10. Identify each person having information relating to any formal or informal trademark searches or investigations, which related to the terms NORTH or 66°, whether alone, or in combination with other terms or with different spellings/pronunciations, and identify all documents relating to the searches or investigations.

ANSWER: Opposer is still investigating and reserves the right to supplement answer. Any such documents related to the searches and/or investigations are privileged attorney-client and/or work product.

SUPPLEMENTAL ANSWER: The following individuals are likely to have knowledge relating to the promotion of the marks related to the terms NORTH or 66°, the products offered thereunder, factors affecting the issues of trademark priority, and the prosecution of applications for registration and/or registration of the 66°NORTH marks.

- (e) Bjarney Hardardottir
- (f) Fannar Pall Aosalsteinsson
- (g) Hermann Sigursteinsson
- (h) Rosa Tryggvadottir

Opposer is still investigating other personnel, individuals, and/or related entities that may have relevant discoverable information and reserves the right to supplement answer. Any such documents related to the searches and/or investigations are privileged attorney-client and/or work product. See Opposer's Initial Disclosures.

11. State Opposer's yearly expenditures to date with respect to the advertising and promotion of Opposer's mark in conjunction with all goods or services since sales first began under Opposer's mark in the U.S.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response to the extent relevant.

12. Describe the circumstances under which Opposer first became aware of Applicant's use or registration of Applicant's mark and identify all persons involved.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response.

13. Specify the approximate gross revenue including, but not limited to, projected revenue generated by sales of Opposer's goods or services under Opposer's mark for each year since such sales began in the U.S. to the present.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response to the extent relevant.

SUPPLEMENTAL ANSWER: The approximate gross revenue generated by sales of Opposer's goods or services under Opposer's marks since 2005 in the U.S. to the present amounts to \$10,200,977 (USD). To the extent that the Opposer is still investigating this interrogatory, it will further supplement its response to the extent relevant. See Bates No. Plaintiff 001005.

14. Identify all instances in which any person has been or claimed to be confused, mistaken, or deceived as to the relationship between Opposer and any other entity, or as to the products or services of Opposer and any other entity.

ANSWER: Opposer objects this interrogatory on grounds of relevancy. The likely confusion between Opposer and any third parties is not at issue in this proceeding.

15. Identify all trade shows at which Opposer has attended or promoted its goods and/or services under Opposer's mark, and all trade shows it plans to attend in the future to promote Opposer's mark.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response.

16. Identify each person that Opposer expects to call as a witness in this proceeding, and state the subject matter on which such witness is expected to testify.

ANSWER: Opposer incorporates herein by reference those individuals identified in the parties' initial disclosures and will provide its expert disclosures in due course and by the July 14, 2018 deadline.

17. Identify with specificity all retail and/or wholesale outlets in which Opposer provides and intends to provide goods or services in connection with Opposer's mark, and fully provide the names and addresses of all such entities.

ANSWER: See Answer to Paragraph 7, *infra*. Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response.

18. Identify with specificity any other circumstances in which Opposer's mark has been or will be used in the marketplace as a trademark, outside of places mentioned in response to Paragraph 17 of Applicant's First Set of Interrogatories.

ANSWER: Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response.

19. Specify whether Opposer intends to expand the goods offered under Opposer's mark to other goods or services, other channels of trade, or other geographic territories, and identify all documents relating or referring to such expansion.

ANSWER: Opposer intends to expand. Opposer is unable to fully answer at this time, as it is still investigating this interrogatory and will further supplement its response to the extent relevant.

20. Specify the meaning of, and intent behind Opposer's use of 66°NORTH or 66°N.

ANSWER: Opposer is not aware of any meaning the mark has other than as a trademark.

Respectfully submitted,

Dated: August 13, 2018

/s/ Michele S. Katz
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606

Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S SUPPLEMENTAL RESPONSE TO APPLICANT'S FIRST SET OF INTERROGATORIES is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: August 13, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 22

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

**OPPOSER’S SUPPLEMENTAL RESPONSE TO APPLICANT’S REQUEST FOR
DOCUMENTS AND THINGS**

Pursuant to 37 C.F.R. 2.120 and Rules 26 and 34 of the Federal Rules of Civil Procedure, Opposer hereby supplements its responses to the following requests for production of documents and things served on May 10, 2018.

GENERAL OBJECTIONS

The objections included in Opposer’s Supplemental Responses to Applicant’s Interrogatories are incorporated herein by reference.

DOCUMENTS AND THINGS TO BE PRODUCED

1. All documents identified by Opposer in response to Applicant’s First Set of Interrogatories.

ANSWER: Opposer objects to this document request as being overly broad and unduly burdensome and is designed more to harass Opposer than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. Plaintiff 000001 – 001005.

2. A representative sampling of logotypes and designs that incorporate any 66° NORTH or 66°N mark that Opposer has used, is presently using, or is planning to use in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable at this time pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. Plaintiff 000177 – 000998.

3. All documents relating to communications with third parties, other than your counsel, concerning the continued use and registration of the opposer's mark.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace "Applicant" terms with "Opposer" in the answer above.

4. All documents relating to any actual confusion between Opposer and third parties regarding Opposer's mark.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Moreover, Opposer objects to this document request on grounds of relevancy as any actual confusion between Opposer and third parties is not relevant to the present opposition. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace “Applicant” terms with “Opposer” in the answer above.

5. All documents relating to any incident or proceeding in which a third party has challenged Opposer’s use or registration of, or the rights Opposer claims in Opposer’s mark, including but not limited to any demand to cease and desist.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable at this time pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. Plaintiff 000177 – 000979.

6. All documents relating to any incident or proceeding in which Opposer has challenged the rights of a third party (not including Applicant) based on the rights Opposer claims to Opposer’s mark, including but not limited to any demand to cease and desist.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible

evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable at this time pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. Plaintiff 000074 – 000128 and 000750 – 000982.

7. All documents relating to any investigation, trademark search, and/or other inquiry conducted by Opposer, and/or on Opposer's behalf, in connection with assessing the availability, registrability, or use of Opposer's mark in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace "Applicant" terms with "Opposer" in the answer above.

8. All documents relating to studies, tests, ratings, and/or surveys in connection with Opposer's mark or Opposer's goods/services.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace "Applicant" terms with "Opposer" in the answer above.

9. Documents sufficient to identify every good and services on or in connection with which Opposer has used or is using Opposer's mark in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable at this time pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. Plaintiff 000001 – 000998.

10. All documents related to Opposer's intended use of Opposer's mark in connection with Opposer's goods and services in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable at this time pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. Plaintiff 000133 – 001004.

11. All documents related to communications directed to, addressed to, or intended for Applicant but received by Opposer.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace “Applicant” terms with “Opposer” in the answer above.

12. All documents prepared by any expert employed by Opposer in connection with its formation of an opinion concerning the subject matter of this Opposing.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace “Applicant” terms with “Opposer” in the answer above.

13. All documents which Opposer believes provide any support for each response in Opposer’s Answers to Applicant’s First Set of Interrogatories.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable at this time pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. Plaintiff 00001 – 001005.

14. Documents and things which list the different geographic areas where Opposer’s goods and services are sold or offered for sale.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible

evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable at this time pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. 000999 – 001004.

15. Documents and things which list the different retail stores where Opposer's goods and services are sold or offered in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place. See responses to interrogatories, para.7, for relevant documents and things.

SUPPLEMENTAL ANSWER: Replace "Applicant" terms with "Opposer" in the answer above.

16. A representative sampling of advertising and promotional material for Opposer's goods and services.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace "Applicant" terms with "Opposer" in the answer above.

17. Documents and things that show placement and/or the recommended placement of Opposer's products/services in retail stores, including any planograms sent to retailers.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace “Applicant” terms with “Opposer” in the answer above.

18. Documents and things that refer and/or describe the target consumers of Opposer’s goods and services in the U.S.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace “Applicant” terms with “Opposer” in the answer above.

19. Documents and things that refer to and/or describe Opposer’s intended meaning of Opposer’s mark.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Replace “Applicant” terms with “Opposer” in the answer above.

20. Documents and things that refer to and/or describe the use of the term NORTH as a trademark in the U.S. in connection with goods and services in classes 16, 18, 25 and 35.

ANSWER: Applicant objects to this document request as being overly broad and unduly burdensome and is designed more to harass Applicant than to lead to the discovery of admissible evidence. Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, will be produced at a mutually convenient time and place.

SUPPLEMENTAL ANSWER: Subject to the General Objections and as presently advised, responsive non-privileged documents, if any, have been provided to the extent possible and reasonable at this time pursuant to the Pretrial Disclosure Documents discovery phase. See Bates Nos. 000384 – 00998.

Respectfully submitted,

Dated: August 13, 2018

/s/ Michele S. Katz
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S SUPPLEMENTAL RESPONSE TO APPLICANT'S REQUEST FOR DOCUMENTS AND THINGS is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: August 13, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 23

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

In the Matter of Trademark Application)	
Serial No. 87/358942)	
Published August 22, 2017)	
)	
<hr/>		
SJOKLAEDAGERDIN HF.,)	
)	
Opposer)	
)	
v.)	Opposition No. 91237366
)	
NORTH 61, LLC)	Mark: NORTH 61
)	
Applicant.)	

**OPPOSER’S SUPPLEMENTAL RESPONSE TO APPLICANT’S
REQUEST FOR ADMISSIONS**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, Opposer hereby submits the following supplemental objections and answers to Applicant’s Request for Admissions served on May 10, 2018.

GENERAL OBJECTIONS

The objections included in Opposer’s Supplemental Responses to Applicant’s Interrogatories are incorporated herein by reference.

MATTERS TO BE ADMITTED

1. The mark NORTH 61 is not identical in sound to the mark 66°NORTH or 66°N.
ANSWER: Admitted.

2. The use of the symbol “°” in Opposer’s mark means “degrees.”
ANSWER: Admitted.

3. Opposer’s mark is intended to convey the commercial impression of “66 degrees north,” which is the 66th parallel north, a circle of latitude that is 66 degrees north of the Earth’s equatorial plane where Iceland, Opposer’s origin, is located.

ANSWER: The first clause is admitted; the second clause is denied.

4. The mark NORTH 61 differs in appearance from 66° NORTH or 66°N.

ANSWER: Denied, as any differences between the marks identified in paragraph 4 are slight.

5. The mark NORTH 61 has a different meaning to 66°NORTH and 66°N.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

SUPPLEMENTAL ANSWER: Opposer is without sufficient knowledge to admit or deny the request and therefore denies the same.

6. The mark NORTH 61 connotes a different commercial impression from 66°NORTH and 66°N.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

SUPPLEMENTAL ANSWER: Opposer is without sufficient knowledge to admit or deny the request and therefore denies the same.

7. Opposer does not have exclusive rights to the use of the term NORTH for clothing in the U.S.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

SUPPLEMENTAL ANSWER: Opposer is without sufficient knowledge to admit or deny the request and therefore denies the same.

8. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for clothing.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

SUPPLEMENTAL ANSWER: Opposer is without sufficient knowledge to admit or deny the request and therefore denies the same.

9. Opposer does not have exclusive rights to the use of the term NORTH for class 18 bags in the U.S.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

SUPPLEMENTAL ANSWER: Denied to the extent Opposer has rights to the use of the term for class 18 goods, and as such, Opposer directs Applicant's attention to Opposer's registered marks 66°NORTH (Reg. No. 5075756), 66°N (Reg. No. 5075773), 66°NORTH (Reg. No. 5084208), and 66°NORTH (Reg. No. 5088873). See Bates Nos. Plaintiff 000384 – 000998.

10. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for class 18 goods.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

SUPPLEMENTAL ANSWER: Opposer is without sufficient knowledge to admit or deny the request and therefore denies the same.

11. Opposer does not have exclusive rights to the use of the term NORTH for class 35 services in the U.S.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

SUPPLEMENTAL ANSWER: Denied to the extent Opposer has rights to the use of the term for class 35 services, and as such, Opposer directs Applicant's attention to Opposer's registered marks 66°NORTH (Reg. No. 5075756), 66°N (Reg. No. 5075773), 66°NORTH (Reg. No. 5084208), and 66°NORTH (Reg. No. 5088873). See Bates Nos. Plaintiff 000384 – 000998.

12. According to the U.S. Trademark Register, there are other, unrelated third party registrations comprised of the term NORTH for class 35 retail store services featuring clothing, bags, sporting goods, novelty items, key chains, mugs, posters and stickers.

ANSWER: Applicant is without sufficient knowledge to admit or deny the request and therefore denies the same.

SUPPLEMENTAL ANSWER: Opposer is without sufficient knowledge to admit or deny the request and therefore denies the same.

Respectfully submitted,

Dated: August 13, 2018

/s/ Michele S. Katz
Michele S. Katz
Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSER'S SUPPLEMENTAL RESPONSE TO APPLICANT'S REQUEST FOR ADMISSIONS is being sent by electronic mail, by agreement, to:

Patrick R. Burns
Burns Law Firm PLLC
1324 Harmon Place, Ste. 300
Minneapolis, MN 55403
Patrick@burns-law.mn

Dated: August 13, 2018

By: /s/ Michele S. Katz
Michele S. Katz

Advitam IP, LLC
150 S. Wacker Drive, Suite 2400
Chicago, Illinois 60606
Tel: (312) 332-7710
Email: MKatz@AdvitamIP.com

Attorney for Opposer

EXHIBIT 24



BISON LEATHER BAG
\$455.00



SUP SNAPBACK
\$52.00



MORNING FROST HAT
\$80.00



OBBERG TRAIL HOODIE
\$61.00



CLASSIC SHORT-SLEEVE T-SHIRT
\$24.00



WOMEN'S TAPERED SHORT-SLEEVE T-SHIRT
\$24.00



URL: <https://www.north61.com/shop/>



66°NORTH
Midhraun 11
210 Gardabaer
Tel.: +354 535 6600
E-mail:
66north@66north.com

Contact us

Men

- All products
- Parkas and insulated jackets
- Jackets
- Tops
- Pants
- T-shirts
- Baselayer
- Accessories
- Overalls

Women

- All products
- Parkas and insulated jackets
- Jackets
- Tops
- Pants
- T-Shirts
- Baselayers
- Accessories

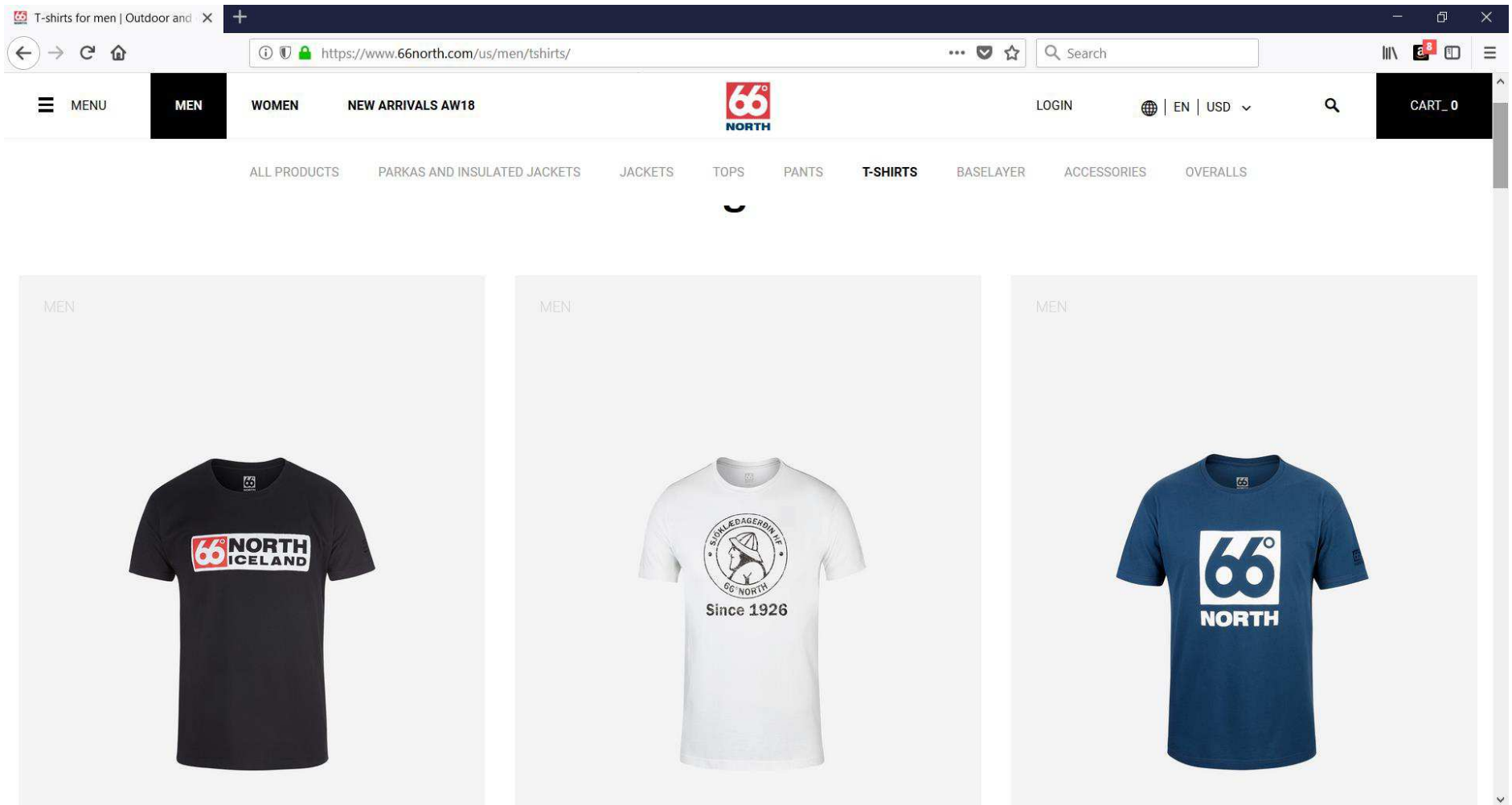
Newsletter

Join our mailing list to receive our newsletters, as well as notifications of special offers and discounts.

E-mail

I would like to subscribe to 66°North newsletter. I confirm that I am 16 years or older and I consent to 66°North processing my personal data in order to send personalized marketing material in accordance with [privacy notice](#).

URL: <https://www.66north.com/us/>



URL: <https://www.66north.com/us/men/tshirts/>

Accessories for men | Outdoor

https://www.66north.com/us/men/accessories/

50% Search

ALL PRODUCTS PARKAS AND INSULATED JACKETS JACKETS TOPS PANTS T-SHIRTS BASELAYER ACCESSORIES OVERALLS

FILTERS Showing 48 of 48 results

DEFAULT SORT

Gola
Sweet Cap
\$20.00

Ice
Bum Bag
\$50.00

Laugavegur
Cap
\$20.00

66 NORTH

66 NORTH ICELAND

URL: <https://www.66north.com/us/men/accessories/>

north61 clothing - Google Search

https://www.google.com/search?biw=1536&bih=750&ei=iqBxW-PHOcSYjwSNxrboDA&q=north61+clothing&oeq=north61+clothing&gs_l=psy-ab.3..0i22i30k1.1117.2197.0.2299.9.8.0.0.0.84.292.4.4.0....0...1.1.64.psy-ab..5.4.290...0j0i10i30k1.0.pGA50nda0RU

north61 clothing

About 32,700 results (0.47 seconds)

North 61
<https://www.north61.com/>
North 61 is family, fun, beauty, and love of a place. American made & upcycled adventure gear inspired by Minnesota's North Shore.
Shop Story Events Social

GO NORTH — North 61
<https://www.north61.com/shop/>
At North 61, all of our clothing, gear and bison leather bags are exclusively American made. It makes a difference. We also sell quality upcycled and reclaimed ...

Events — North 61
<https://www.north61.com/events/>
North 61, 1624 Harmon Place, Suite 300, Minneapolis, MN 55403, United States.
612-423-9533 info@north61.com. Hours. 100% Made in the U.S.A..


Story — North 61
<https://www.north61.com/our-story/>
North 61 hats, bags, sweatshirts, and more. American made & upcycled adventure gear inspired by Minnesota's North Shore. GO NORTH.

North 61 - Home | Facebook
<https://www.facebook.com/north61mn/>
North 61. 238 likes. American made adventure clothing and bison leather bags → inspired by Minnesota's North Shore. Woman-owned + veteran-owned.

Women's Clothing Boutique | Fair Trade | Minneapolis
<https://keynorthboutique.com/>
A specialty boutique featuring exclusive women's clothing, jewelry from local and international designers and it's all fair trade and sustainable.

Sota Clothing - Clean and Simple MN Designs -- sota clothing
<https://www.sotaclothing.com/>
Sota Clothing is a source of creative and original designs organic to Minnesota.
Missing: north61 | Must include: north61

Images for north61 clothing



→ More images for north61 clothing Report Images

66°North. Everyday technical wear from Iceland
<https://www.66north.com/us/>
We have been making outdoor clothing for Icelanders since 1926. Our products are a fusion of our strong Icelandic heritage, contemporary design, ...
Missing: north61 | Must include: north61

NORTH 61 Trademark Application of Patrick D. Burns - Serial Number

URL: https://www.google.com/search?biw=1536&bih=750&ei=iqBxW-PHOcSYjwSNxrboDA&q=north61+clothing&oeq=north61+clothing&gs_l=psy-ab.3..0i22i30k1.1117.2197.0.2299.9.8.0.0.0.84.292.4.4.0....0...1.1.64.psy-ab..5.4.290...0j0i10i30k1.0.pGA50nda0RU

Amazon.com: 66 North

https://www.amazon.com/66-North/pages/7481221011

NEW & INTERESTING FINDS ON AMAZON EXPLORE

amazon

Shop Off to College deals

Deliver to Schaumburg 60159

Departments - Your Amazon.com Today's Deals Gift Cards Registry Sell Treasure Truck Help

EN Hello, Sign in Account & Lists - Orders Try Prime - Cart

Shop 66 North

1-16 of 33 results for 66 North Sort by Featured

FREE Shipping
All customers get FREE Shipping on orders over \$25 shipped by Amazon

Show results for





Women's Fashion
Women's Activewear

Outdoor Recreation
Women's Hiking Clothing
See All 4 Departments

Refine by

Eligible for Free Shipping
 FREE Shipping

Amazon Prime
 Prime

	66 North Women's Grettir Long Sleeve Tee by 66 North \$46⁹⁹ \$89⁰⁰ Prime FREE Shipping on eligible orders Some sizes/colors are Prime eligible ★★★★☆ 2
	66 Degrees North Men's Gunnar Crew Neck by 66 North \$68⁰⁰ \$89⁰⁰ Prime FREE Shipping on eligible orders Some sizes/colors are Prime eligible ★★★★☆ 1
	66 North Men's Grettir Long Sleeve Tee by 66 North \$51⁹⁹ \$63⁹⁸ Prime FREE Shipping on eligible orders Some sizes/colors are Prime eligible ★★★★☆ 3
	66 North Women's Kjolur Light Knit Hooded Jacket by 66 North \$114⁰⁰ \$114⁰⁰ Prime FREE Shipping on eligible orders Some sizes/colors are Prime eligible

URL: <https://www.amazon.com/66-North/pages/7481221011>

NORTH 61 (@north61_mn) • In: X

70% Search


Instagram

north61_mn Follow

109 posts 560 followers 162 following

NORTH 61
American made & upcycled adventure gear
---> inspired by Minnesota's North Shore
| woman-owned + veteran-owned |
#north61 #gonorth
north61.com

POSTS TAGGED



URL: https://www.instagram.com/north61_mn/


North 61 - Home | Facebook

https://www.facebook.com/north61mn

facebook

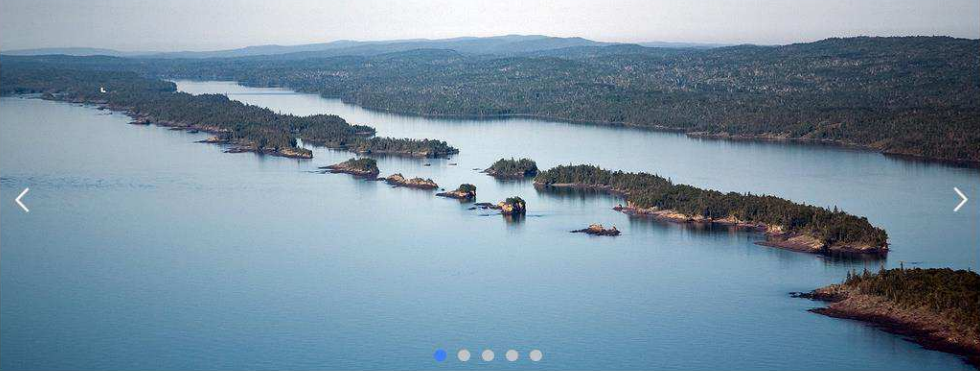
Email or Phone Password [Log In](#)

[Forgot account?](#)



North 61
@north61mn

- Home
- Posts
- Reviews
- Photos
- Community
- Videos
- Events



[Like](#) [Share](#) [Suggest Edits](#) [Shop Now](#) [Send Message](#)

Posts

Search for posts on this Page

North 61
August 11 at 12:10 PM · Instagram ·

61 Travelers... Traveler no. 7 @kidavies in our women's T on a summer day... on a rock... By a bay. Sorry about that. #north61 #north61mn

Tag us in your favorite photos of North 61 clothing.

See more of North 61 on Facebook

[Log In](#) or [Create New Account](#)

North 61
Clothing (Brand)

Community

Like people like this

Typical people with a size

URL: <https://www.facebook.com/north61mn>

66°NORTH (@66north) • Instagram

70% Search Log In Sign Up

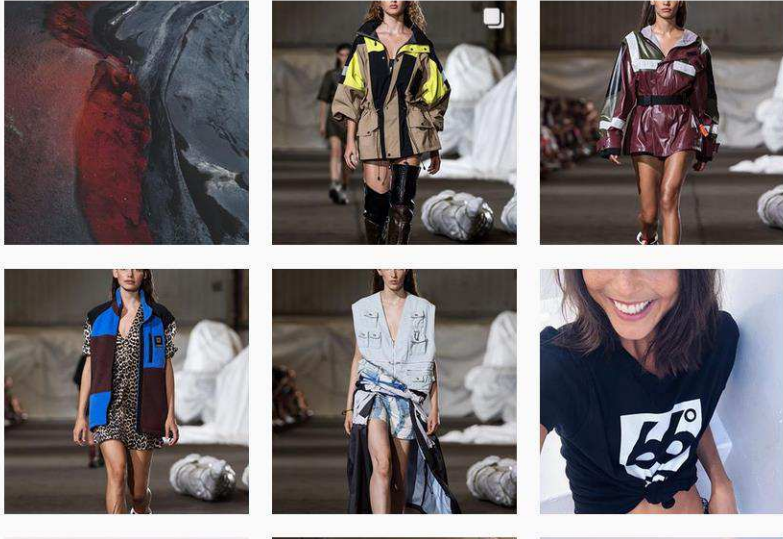
Instagram

66°NORTH [Follow](#)

1,962 posts 44k followers 66 following

66°NORTH
One of Iceland's oldest manufacturing companies, founded in 1926. 66°NORTH provides high quality everyday technical wear true to its heritage.
bit.ly/2vTzEF1

POSTS TAGGED



<https://www.instagram.com/66north/#>


URL: <https://www.instagram.com/66north/>

66North - Home | Facebook

https://www.facebook.com/66north


facebook

Email or Phone Password [Log In](#)
[Forgot account?](#)



66North
@66north

- Home
- About
- Photos
- Videos
- Instagram feed
- Events
- Posts
- Shop
- Locations
- Offers
- Community
- Info and Ads



[Like](#) [Share](#) [Suggest Edits](#) [Learn More](#) [Send Message](#)

Photos

Search for posts on this Page

66North
Clothing Company

See more of 66North on Facebook

[Log In](#) or [Create New Account](#)

Founded in 1925 to have the elements
Founded in 1925 by Hans
for the purpose of making
the best

URL: <https://www.facebook.com/66north>

66°NORTH (@66north) | Twitter X


Twitter, Inc. (US) | <https://twitter.com/66north>

Home Moments

Search Twitter

Have an account? **Log in**

Have an account?
Phone, email, or username
Password
 Remember me · [Forgot password?](#)
Log in
New to Twitter?
Sign up



66°NORTH
@66north

66°NORTH is one of Iceland's oldest manufacturing companies, founded in 1926. 66°NORTH provides high quality outdoor clothing true to its heritage.

66north.com


Tweets	Following	Followers	Likes	Lists
1,869	1,395	4,128	722	1

Follow

Tweets Tweets & replies Media

66°NORTH @66north · Jul 27
Festival season in Iceland = stock up on workwear.

See the full collection of festival photos here bit.ly/2OjFxEK



New to Twitter?
Sign up now to get your own personalized timeline!
Sign up

You may also like · Refresh

URL: <https://twitter.com/66north>

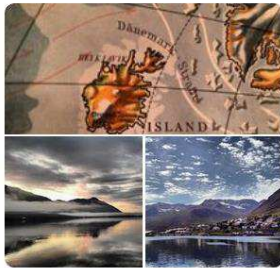
66°NORTH

663 followers · 109 following

Iceland · 66°NORTH is one of Iceland's oldest manufacturing companies, founded in 1926. 66°NORTH provides high quality outdoor clothing true to its heritage.



66°NORTH's best boards



Iceland
28 Pins



Women's
93 Pins



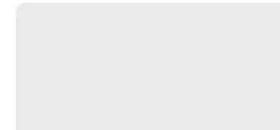
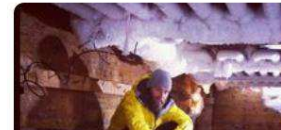
Men's
2 Pins



Kids
37 Pins



Infants
23 Pins



URL: <https://www.pinterest.com/66north/>

66northiceland - YouTube

https://www.youtube.com/user/66northiceland

Search


Home Trending History

BEST OF YOUTUBE

- Music
- Sports
- Gaming
- Movies
- TV Shows
- News
- Live
- Spotlight
- 360° Video

Browse channels

Sign in now to see your channels and recommendations!



66north.com

66
NORTH

66northiceland
509 subscribers

SUBSCRIBE

HOME VIDEOS PLAYLISTS CHANNELS DISCUSSION ABOUT

Summer is in the air

56 views • 4 weeks ago

Welcome to Iceland. A summer destination like no other.

POPULAR CHANNELS

- The ACE Family
SUBSCRIBE
- David Dobrik
SUBSCRIBE
- 5-Minute Crafts
SUBSCRIBE
- shane

Design March PLAY ALL

URL: <https://www.youtube.com/user/66northiceland>



Follow 66north **tumblr**

Video April 11, 2016 3 notes



ABOUT



66north 66°NORTH is one of Iceland's oldest manufacturing companies, founded in 1926. 66°NORTH provides high quality outdoor clothing true to its heritage.

LATEST TWEETS

Festival season in Iceland = stock up on workwear. See the full collection of festival

URL: <http://66north.tumblr.com/>

66north



CHAT ? Sign In / Create Account

BRANDS JACKETS CLOTHING FOOTWEAR HIKE & CAMP CLIMB WATER SPORTS MORE ACTIVITIES SALE

JACKETS ▾
MEN'S ▾
WOMEN'S ▾

LEARN MORE ABOUT 66NORTH

My New Year's resolution was to be more efficient, so I've started listening to music at 2x the speed.

Learn More About 66North

NEED HELP?

66north (113 results)

- Category
 - Outerwear (67)
 - Clothing (23)
 - Travel Gear (2)
 - Hiking And Camping Gear (1)
- Discount
 - 50% or More (10)

Sort by: Most Popular

Page 1 of 3 | View All



URL: <https://www.moosejaw.com/moosejaw/shop/SearchDisplay?searchTerm=66north&categoryId=&cmCat=-10020&storeId=10208&catalogId=10000001&langId=-1&pageSize=48&beginIndex=0&sType=SimpleSearch&resultCatEntryType=2&showResultsPage=true&searchSource=Q&pageView=&isFreeSearch=true>

17 styles found



66 North Holar Primaloft High Collar Insulation Anorak In Orange
\$195.50 ~~\$356.00~~



66 North Snaefell Shell Performance Outdoor Jacket In Black
\$326.00 ~~\$593.00~~



66 North Vik Hooded Lightweight Mid Layer Jacket In Black
\$94.50 ~~\$237.00~~



66 North Grandi Lambswool Sweater With Chest Pocket In Navy
\$152.00 ~~\$277.00~~

WELCOME TO ASOS



You're in United States

CHANGE

SHOPPERS IN UNITED STATES GET:

Free Delivery & Returns
Delivery in 2-6 days
Students Get 10% off 24/7



URL:

http://us.asos.com/search/?q=66+North&channelref=paid%2Bsearch&affid=2365&ppcadref=939296297%7C50057340957%7Ckwd-300672094309&_cclid=v3_616222a0-debd-597c-86c3-76add6816181&gclid=EAiaIQobChMI9uPSgbPq3AIVQ57ACh3aIQMfEAMYASAAEgK2fPD_BwE

EXHIBIT 25

FILED UNDER SEAL