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

Proceeding	91241706
Party	Plaintiff RLP Ventures, LLC
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Submission	Motion to Compel Discovery or Disclosure
Filer's Name	Ramona Prioleau
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Signature	/Ramona Prioleau/
Date	02/04/2019
Attachments	Motion to Compel Discovery re 91241706.pdf(409200 bytes)

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

RLP Ventures, LLC Opposer, v. The Skanner Foundation Applicant.	Opposition No. 91241706 Mark: VANPORT MOSAIC Filed: October 2, 2017 Published: February 13, 2018 Application No. 87/630,710

OPPOSER'S MOTION TO COMPEL DISCOVERY

RLP Ventures, LLC ("Opposer"), in accordance with Rule 523 of the Trademark Trial and Appeal Board Manual of Procedure ("TBMP"), submits this motion to compel respectfully requesting that the Board order The Skanner Foundation ("Applicant") to comply with its discovery obligations providing responses to: (a) Opposer's First Set of Interrogatories and (b) Opposer's First Set of Document Requests.

In addition, Opposer seeks a determination pursuant to § 523.01 of the TBMP that Applicant's failure to provide its initial disclosures should bar Applicant from propounding discovery requests, whether interrogatories, requests for production or requests for admission. Opposer requests that the proceedings be suspended pending the determination of the instant Motion.

PRELIMINARY STATEMENT

The Opposer has made a good faith effort to resolve this discovery dispute with Applicant without motion practice. However, Applicant's disregard of its obligation under the TBMP has made this Motion necessary. Thus, in accordance with TBMP §523, Opposer respectfully requests that its Motion to Compel be granted in its entirety.

A. The Opposer and the Origins of the Opposer's Mark

The relevant facts are fully set forth in the Notice of Opposition, dated June 10, 2018, and are summarily reiterated herein for the Board's convenience.

1. The Opposer is the owner and operator of an entity using the trademark "MOSAEC" ("Opposer's Mark"). The MOSAEC platform is a commerce, content, advertising and social media ecosystem that spotlights film, music, art, theater, dance, literature, fashion, sports, locales as well as culture, including African American history. The platform has also been used for educational and philanthropic services. In addition, via the MOSAEC platform, the Opposer sells consumer goods, buys and sells advertising, and seeks funding from individuals, corporations and governments.

2. The MOSAEC engagement platform encourages people from diverse cultures and countries to connect via virtual and in-person community interactions. The MOSAEC platform allows members to enter, access and track cross-cultural activities while also exploring and evaluating information on a variety of multicultural subjects, including African American history.

3. The use of the Opposer's Mark commenced as early as September 1998. The concept for the MOSAEC platform was developed during calendar years 1996 1998. The MOSAEC-branded service was initially conceptualized in paper form and later transitioned to a digital format. Aspects of the business plan and source code for the MOSAEC platform were developed by the Opposer during calendar years 1996 1999 during courses the Opposer's owner took at New York University and other schools

4. The MOSAEC platform was released first in a "beta" form during the fall of 1998. The beta version of the website was used, in part, to recruit talent, seek funding, and sell ads. The "gamma" version of the platform was launched in the spring of 1999. Since its 1999 launch, the MOSAEC platform has been accessible throughout the United States (including, without

limitation, in Oregon - the apparent base of operations for the Applicant) and internationally, with users engaging within the platform's community and purchasing its consumer goods. Contributors to the MOSAEC platform have resided throughout the United States. Through the use of the MOSAEC platform, consumer goods have been distributed to its users and contractors throughout the United States.

5. The Opposer built the MOSAEC platform from the ground up, investing substantial amounts of time and money, including promoting the MOSAEC platform via national and international advertising channels. With great effort, the Opposer has continued to operate the MOSAEC platform through market downturns (2001 and 2009).

6. Since the adoption of Opposer's Mark, the MOSAEC platform has been used and accessed by a notable number of users. For example, since 2008, there have been over 700,000 YouTube views of videos incorporating the MOSAEC brand in connection with the Opposer's services. Since 2009, there have been over 143,000 likes recorded in connection with the Facebook presence associated with the MOSAEC platform. On Twitter, since 2009, the MOSAEC platform's page has garnered over 9,000 followers. Branded tweets have been retweeted by Tribeca Film Festival (@TribecaFilm), which has over 205,000 followers; tweeted by Michael Skolnik (@MichaelSkolnik), who has over 207,000 followers and retweeted by Brad Gilbert (@bgtennisnation), who has over 138,000 followers. The LinkedIn presence for the MOSAEC platform has been in existence since 2009 and an Instagram presence has been recently added. Within the Google environment, the term "MOSAEC" has been a part of over 3,000 search results.

7. Opposer is the owner of numerous registrations and applications on the Principal Register of the United States Patent and Trademark Office for Opposer's Mark, including:

Mark	Application or Registration No.	Good/Services (collectively, the "Opposer's Goods and Services")	Application or Registration Date
MOSAEC	87/226,106	*"Computer application software for desktop computers and mobile devices, namely, software for compilations, rankings, ratings, reviews, referrals and recommendations relating to entertainment, film, fine arts, museums, literature, culture, music, sports, fashion, theater, dance, restaurants, recreation and leisure activities; Computer application software for desktop computers and mobile devices, namely, software for entering, accessing and tracking data related to entertainment, film, fine arts, museums, literature, culture, music, sports, fashion, theater, dance, restaurants, recreation, leisure activities and social networking; Computer application software for desktop computers and mobile devices, namely, software for uploading, posting, showing, displaying, tagging, blogging, sharing or otherwise providing electronic media or information over the Internet or other communications network; Computer application software for desktop computers and mobile devices, namely, software for displaying and sharing a user's location and finding, locating, and interacting with other users and places; Computer software to enhance the audio-visual capabilities of multimedia applications, namely, for the integration of text, audio, graphics, still images and moving pictures; Downloadable electronic newsletters in the field of entertainment, film, fine arts, museums, literature, culture, music, sports, fashion, theater, dance, restaurants, recreation and leisure activities; Downloadable mobile applications for entering, accessing and tracking data related to entertainment, film, fine arts, museums, literature, culture, music, sports, fashion, theater, dance, restaurants, recreation, leisure activities and social networking; Computer e-commerce software to allow users to perform electronic business transactions via a global computer network;"* in Class 009.	November 4, 2016

MOSAEC	87/469,079	*"Fundraising services, by means of sharing profits from the sale of socially responsible products with not-for-profit organizations, schools, and civic groups; Charitable fundraising services for namely, raising funds to support programs related to engagement in entertainment, film, fine arts, museums, literature, culture, music, sports, fashion, theater, dance, culinary, recreation and leisure activities; On-line business fundraising services;"* in Class 036.	May 31, 2017
MOSAEC	5,409,856	*"Entertainment services, namely, providing information by means of a global computer network in the fields of celebrities, entertainment, and popular culture; Entertainment services, namely, providing on-line reviews of entertainment, film, fine arts, museums, literature, culture, music, sports, fashion, theater, and dance; Providing a website featuring entertainment information in the field(s) of entertainment, film, fine arts, museums, literature, culture, music, sports, fashion, theater, dance, and news; Providing information, news and commentary in the field of entertainment; Providing information, news and commentary in the field of recreation and leisure activities; Provision of information relating to children's entertainment;"* in Class 041.	February 27, 2018
MOSAEC	5,284,032	*"Providing temporary use of a non-downloadable web application for posting, searching, accessing, sharing, and tracking reviews, ratings, referrals, recommendations, and other information as well as advertising, uploading photos, adding videos, finding, locating, and interacting with other users, related to entertainment, film, fine arts, museums, literature, culture, music, sports, fashion, theater, dance, restaurants, recreation and leisure activities;"* in Class 042.	Sep. 12, 2017
MOSAEC	5,335,465	*"Providing information in the field of temporary lodging and accommodations for travelers; Providing information, news and commentary in the field of dining;"* in Class 043.	November 14, 2017

The dates of first use given are as early as September 1998.

B. Applicant's Mark

8. Pursuant to Section 1(b) of the Lanham Act, The Skanner Foundation ("Applicant") filed intent-to-use Application Ser. No. 87/630,710 to register the mark VANPORT MOSAIC ("Applicant's Mark") on the Principal Register of the United States Patent and Trademark Office on October 2, 2017 and published for opposition on February 13, 2018, covering the following services ("Applicant's Services")::

> "Charitable donation services, namely, providing educational programming, contests and various presentations in the field of general and historical interest related to the State of Oregon and African-American history; Educational services, namely, conducting programs in the field of general and historical interest related to the State of Oregon and African-American history" in Class 41.

9. The date set by the Board to serve initial disclosures was September 18, 2018. On September 18 2018, Opposer served its initial disclosures upon Applicant (see Exhibit A). The Applicant did not serve Applicant's initial disclosures upon Opposer by September 18, 2018. To date, the Applicant has not served Applicant's initial disclosures upon Opposer.

I. <u>FACTUAL BACKGROUND AND STATEMENT OF GOOD FAITH EFFORT TO RESOLVE</u>

On September 20, 2018, the Opposer served Applicant with Opposer's First Set of Interrogatories ("Interrogatories", see Exhibit B) and Opposer's First Set of Document Requests ("Document Requests", see Exhibit C). The responses to Opposer's Interrogatories and Document Requests were due on October 20, 2018. The Applicant failed to respond on October 20, 2018.

On October 22, 2018, Applicant's then-attorney moved to withdraw as counsel, stating that:

> the Firm has delivered to Applicant all documents and property concerning the Application and Opposition to which Applicant is entitled. The Firm has further notified Applicant of the status of the proceedings…. (5 TTTABVUE).

On October 29, 2018, the Board granted the motion of Applicant's then-attorney to withdraw as counsel (6 TTABVUE). On December 10, 2018, the Board reset the trial dates (7 TTABVUE).

On January 17, 2019 (Exhibit D), Opposer sent an email to Applicant requesting responses to Opposer's Interrogatories and Document Requests. On January 30, 2019, Opposer sent Applicant a Letter re Failure to Respond (see Exhibit E), requesting a response by February 1, 2019. On January 30, 2019, Opposer sent an email to Applicant requesting Applicant's Initial Disclosures (see Exhibits F), requesting a response by February 1, 2019. The Applicant failed to respond to either request on February 1, 2019.

Opposer has no assurance whatsoever that Applicant will ever provide responses to Opposer's Interrogatories and Document Requests or serve Applicant's Initial Disclosures.

To date, and following multiple efforts to get Applicant to respond to Opposer's requests, Applicant has not provided responses to Opposer's Interrogatories and Document Requests. Additionally, Applicant has not served Applicant's Initial Disclosures.

Opposer has made a good faith effort, in accordance with TBMP §§ 523 and 524.02, to resolve these issues. Applicant's failure to respond to Opposer's discovery requests is in contravention of the Trademark Rules which require cooperation in discovery and obligate the parties to meet reasonable discovery needs. Applicant has refused to do so and thus prejudices Opposer in discovery and ultimately at trial as Opposer will not have access to the relevant information and documents it needs. Applicant's failure to cooperate in discovery also delays the instant proceeding and deprives Opposer of its ability to determine whether follow up discovery is necessary and the opportunity to issue such follow up discovery.

Applicant should be compelled to provide Opposer forthwith with Applicant's responses to Opposer's Interrogatories and Document Requests so that Opposer can determine who, if anyone, it may want to depose and/or seek additional documents from during discovery.

Pursuant to the Board's December 10, 2018 Order, the discovery period closes June 14, 2019 (7 TTABVUE).

ARGUMENT

Opposer now seeks an Order from the Board compelling Applicant to provide full and complete responses and document production in response to Opposer's Interrogatories and Documents Requests. Opposer further seeks a determination that Applicant's failure to provide its initial disclosures bars Applicant from propounding discovery requests, whether interrogatories, requests for production or requests for admission.

A. No Response Provided to Interrogatories and Discovery Requests

A motion to compel may be filed when a party fails to produce requested documents or responses. See, e.g., 37 C.F.R. 2.120(e)(1). If the non-moving party cannot show that neglect of its discovery obligations was excusable, the Board generally should order that discovery responses be provided without objection. See No Fear, Inc. v. Rule, 54 USPQ2d 1551, 1554 (TTAB 2000).

Here, Applicant cannot show that its neglect of its discovery obligations was excusable. Applicant was reminded of its obligation under the TBMP and Federal Rules to provide responses to Opposer's discovery requests. Annexed hereto as Exhibits D and E is correspondence sent by Opposer to Applicant on January 17 and 30, 2019, neither of which have been answered. No response whatsoever has been received to Opposer's discovery requests. Applicant has given no assurance whatsoever that it will ever provide responses to Opposer's discovery requests.

B. Applicant's Failure to Timely Provide Initial Disclosures

Section 523.01 of the TBMP provides that:

> A party who fails to provide its initial disclosures will be barred from propounding discovery requests, whether interrogatories, requests for production or requests for admission, and may not file a motion to compel to obtain responses to improperly propounded discovery requests.

Here, Applicant initial disclosures were due on September 18, 2018 (2 TTTABVUE). The Applicant cannot show that it served its initial disclosure by the due date of September 18, 2018. To date, Applicant's Initial Disclosures have not been served. Applicant was reminded of its obligation to serve its initial disclosures. Annexed hereto as Exhibit F is an email sent by Opposer to Applicant's on January 30, 2019, which has not been answered. Applicant has given no assurance whatsoever that it will ever serve Applicant's initial disclosures. As such, Applicant should be barred from propounding discovery requests, whether interrogatories, requests for production or requests for admission. See Dating DNA LLC v. Imagini Holdings Ltd., 94 USPQ2d 1889, 1893 (TTAB 2010); Amazon Technologies Inc. v. Wax, 93 USPQ2d 1702, 1705-06 (TTAB 2009) (a party that wishes to object to discovery on the ground that its opponent failed to make its required initial disclosures prior to serving the discovery must assert that basis for objection to the discovery clearly and specifically).

CONCLUSION

WHEREFORE, for the reasons set forth herein, Opposer's motion to compel should be granted in its entirety and Applicant should be compelled to serve its outstanding responses to Opposer's Interrogatories and Document Requests. In addition, Opposer should be granted a determination that Applicant's failure to provide its initial disclosures bars Applicant from propounding discovery requests, whether interrogatories, requests for production or requests for admission.

In light of the fact that Applicant has negatively impacted Opposer's efforts to obtain discovery in this matter, we ask that the Board suspend this proceeding pending resolution of this motion to compel.

Respectfully submitted,

Dated: February 4, 2019

By: /s/Ramona Prioleau

Ramona Prioleau
RLP Ventures, LLC
Times Square Station
P.O. Box 2605
New York, NY 10108-2605
rlpvllc@gmail.com

OPPOSER

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the attached Motion to Compel Discovery was served on the Applicant on the date listed below via email:

Bernie Foster
The Skanner Foundation
415 N Killingsworth Street
Portland, OR 97217
bernie@theskanner.com

Dated: February 4, 2019

By: /s/Ramona Prioleau
Ramona Prioleau

EXHIBIT A

Gmail **RLP Vent <rlpvllc@gmail.com>**

Opposition Number: 91241706

1 message

RLP Vent <rlpvllc@gmail.com> Tue, Sep 18, 2018 at 12:29 PM
To: Winston Folmar <winston@resnovalaw.com>
Cc: "Jia J. Feng" <jia@resnovalaw.com>, Susan Ford <susan@resnovalaw.com>, Jamie Lynn Summerfield <jamielynn@resnovalaw.com>

Please see attached.

Initial Disclosures re 91241706.pdf
95K

EXHIBIT B

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

RLP Ventures, LLC Opposer, v. The Skanner Foundation Applicant.	Opposition No. 91241706 Mark: VANPORT MOSAIC Filed: October 2, 2017 Published: February 13, 2018 Application No. 87/630,710

OPPOSER'S FIRST SET OF INTERROGATORIES

In accordance with Rule 33 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, Opposer RLP VENTURES LLC requests that Applicant THE SKANNER FOUNDATION answer the following interrogatories under oath, within thirty (30) days of the date of service hereof.

The Interrogatories shall be answered in accordance with the Instructions and Definitions set forth below. The full text of Instructions and Definitions shall be deemed incorporated by reference into each Interrogatory.

INSTRUCTIONS

1. These Interrogatories are continuing in nature. Your attention is called to Rule 26(e)(1) of the Federal Rules of Civil Procedure, which provides:

> A party who has made a disclosure under Rule 26(a) - or who has responded to an interrogatory, request for production, or request for admission - must supplement or correct its disclosure or response:
> (A) in a timely manner if the party learns that in some material respect the disclosure or response is incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing.

2. Furnish all information available to you as of the date of your Answers to this First Set of Interrogatories, including that obtained by or in the possession of your attorneys. If you are unable to answer an interrogatory fully and completely, after exercising due diligence to secure the information necessary to answer such interrogatory to the fullest extent possible,

specify the extent of your knowledge and your inability to answer the remainder, setting forth the efforts you made to obtain the requested information.

3. If the identity of any individual or entity other than a named party to this proceeding is sought or given, supply the full name, business address (or, if unknown, the home address) and telephone numbers of each, including said information for any of your employees, agents, attorneys, servants and representatives, not parties hereto, who are mentioned herein. For any individual or entity so identified, give his, her, or its relationship, if any, to you.

4. With respect to any conversations or discussions with anyone whom you mention in the Answers hereto, give the name(s) of the individual(s) with whom such conversations or discussions took place, and the date and location, by state and city, of said conversations or discussions.

5. The information requested herein is intended to include all knowledge and information of Applicant, its agents, legal representatives, predecessor(s), if any, as well as its divisions, affiliates, parent and subsidiary entities, both controlled and wholly-owned, all related companies (as defined by 15 U.S.C. § 1127), and the past and present officers, directors, employees, representatives, attorneys and other personnel thereof.

6. If you object to any interrogatory or interrogatory subpart, or otherwise withhold responsive information because of the claim of privilege, work product, or other grounds:

a. Identify the interrogatory question and subpart to which objection or claim of privilege is made;
b. State whether the information is found in a document, oral communication, or in some other form;
c. Identify all grounds for objection or assertion of privilege, and set forth the factual basis for assertion of the objection or claim of privilege;
d. Identify the information withheld by description of the topic or subject matter, the date of communication, and the participants; and
e. Identify all persons having knowledge of any facts relating to your claim of privilege.

7. If you object to any portion of an interrogatory, explain your objection and answer the remainder.

8. If you cannot supply precise information, state your best estimate or approximation (including your best approximation of date by reference to other events, when necessary), and designate the response as an estimate or approximation.

9. If you are unable to comply fully with any interrogatory herein, comply to the extent possible and explain why full compliance is not possible.

10. All interrogatories are directed to information in your possession, custody or control, or within the possession, custody or control of your agents, servants, employees, related companies and attorneys. They are also directed to those firms, corporations, partnerships, or trusts that you control, and to material in the possession, custody or control of employees, agents, friends, trustees, guardians and representatives of such entities.

DEFINITIONS

As used herein, the terms "**The Skanner Foundation**," "**you**," and "**your**" refer to Applicant and include any persons controlled by or acting on behalf of that entity, including, without limitation, to all officers, directors, owners, employees, agents, representatives, and attorneys, and any predecessors, subsidiaries, parent companies, affiliated companies, or joint venturers.

As used herein, the term "**Applicant's Mark**" means the mark "VANPORT MOSAIC".

As used herein, the term "**Opposer's Mark**" means the mark "MOSAEC".

As used herein, the term "**Applicant's Application**" means the USPTO Application No. 87/630,710 filed on October 2, 2017.

As used herein, the term "**Applicant's Services**" refers to each of the items set forth in the Applicant's Application.

As used herein, the term "**Opposer's Application and Registrations**" means the USPTO application and registrations:

Registration or US Serial No.	Registration or Application Date
87/226,106	November 4, 2016
87/469,079	May 31, 2017

5,409,856	February 27, 2018
5,284,032	September 12, 2017
5,335,465	November 14, 2017

As used herein, the terms "**bear**" or "**bearing**" in connection with "**designation**," "**mark**," "**Mark**," "**trademark**," or "**trade name**," as in, for example, "**bearing the designation**," or "**bearing the mark**," shall refer to the designation appearing on any goods or on any advertising, marketing materials, displays, or other materials associated with the referenced goods or services, or in any other way used in connection with any goods or services that would be considered "use" under United States trademark law.

As used herein, the terms "**good**" or "**goods**" shall be construed to include a "**service**" or "**services**."

As used herein, the term "**documents**" shall include, without limitation, all "**writings**" or "**photographs**" of any kind, as those terms are defined in Rule 1001(1) and (2) of the Federal Rules of Evidence (hereinafter the "FRE"), including without limitation the "original" of any such documents as that term is defined in FRE 1001(3), drafts, non-identical copies (whether differing from the original by reason of notations made on the copies or otherwise), and any "duplicate" of said documents, as that term is defined in FRE 1001(4), and shall further include, without limitation, the following items, whether printed or recorded, or reproduced by any electronic or mechanical means or process, or written or produced by hand: writings; drawings; graphs, charts; photographs; phone records; correspondence; notes; telegrams; telefaxes, facsimile transmissions; agreements; drafts of agreements; memoranda; summaries of records of telephone conversations; instructions to employees or independent contractors; opinions; training manuals; reports; field test reports; studies; diaries; plans; brochures; compact discs and all packaging and inserts therefor; advertisements; marketing and promotional materials; specifications; bids; proposals; contracts; trademark applications; trademark registrations; surveys; copyright applications; copyright registrations; patents; patent applications; computer program specifications including input or output specifications; job orders; bills of lading; purchase orders; invoices; material specifications; investigative reports; data compilations from which information can be obtained or translated, if necessary, through detection devices into

reasonably useable form; computer programs; source listings; electronic mail; data processing storage media; and computer printouts.

As used herein, the term "**relating to**" shall include, without limitation, referring to, responding to, concerning, connected with, commenting on, arising out of, regarding, discussing, showing, describing, evidencing, reflecting, analyzing, constituting, and forming a basis for.

As used herein, the term "**person**," as well as any pronoun referring thereto, shall include, without limitation, any natural person, group, investigatory body, governmental unit, governmental agency, governmental department, corporation, association, partnership, limited partnership, joint venture, sole proprietorship, business, organization, or institution.

As used herein, the term "**entity**" shall refer to a person, organization, corporation, partnership, business, association, or other enterprise carrying on a trade or business. The term "**communication**" shall refer to the transmittal of information in the form of facts, opinions, ideas, inquiries, or otherwise, whether oral, written or in electronic form.

"**And**" and "**or**" shall be construed disjunctively and/or conjunctively as necessary in order to bring within the scope of the discovery request all possible responses which might otherwise be construed to be outside of its scope.

"**Identify**" when used herein with respect to a person, shall require a response that includes, without limitation:

(i) the person's full name;
(ii) the person's employer, business position, and business address at the relevant time; and
(iii) the person's last known employer, business position, business address, telephone numbers, facsimile number, and email address.

"**Identify**" or "**state**" when used herein with respect to a business entity, shall require a response that includes, without limitation:

(i) the entity's full name;
(ii) the entity's principal place of business;
(iii) the nature or type of entity;
(iv) the state or jurisdiction of incorporation or registration, if applicable; and
(v) the principal business conducted by such entity.

"**Identify**" or "**state**" when used herein with respect to a document or communication, shall require a response that includes, without limitation:

(i) the general character, nature, or type of the document or communication;
(ii) the date of the document or communication, or, if it has no date or the date is uncertain, the approximate date of its preparation or occurrence;
(iii) the title of the document;
(iv) the full name(s) of the author(s) and all addressee(s) and recipient(s) of the document or communication;
(v) a summary of the document's or communication's contents or subject matter;
(vi) the present location and custodian of the document or communication or any copies thereof; and
(vii) a file number or other identifying mark or code, if applicable.

If any document(s) requested to be identified or produced has or have been destroyed, a response shall require the following additional information as to each such document:

(i) the date of destruction of the document;
(ii) the reason(s) for the destruction of the document;
(iii) the identity of the person who destroyed the document; and
(iv) the identity of any person who directed that the document be destroyed.

If any of these discovery requests cannot be answered in full, then respond to the fullest extent possible, specifying the reasons for the inability to respond to the remainder of the discovery request, and state whatever information or knowledge is available concerning the unanswered portion.

If any responsive information, communication or document is withheld on the basis of any claim of privilege or immunity, a response shall require a general description of the substance or subject matter of the information, communication, or document withheld; a statement of any privilege or immunity being invoked or claimed and the basis therefor; and the identification of all persons who have had access to such information, communication or document. Where applicable, a response shall also require the date of the document and identification of the author or sender, addressee, and all recipients thereof, by name, address, title and business affiliation.

The geographic scope of these requests is the United States, including its territories and possessions, unless otherwise specified.

The following interrogatories shall be deemed to seek answers as of the date hereof, but shall be deemed to be continuing so that any additional information relating in any way to these interrogatories which Applicant acquires or which becomes known to Applicant up to and including the time of trial shall be furnished to Opposer immediately after such information is first acquired or becomes known.

In the following interrogatories, if a privilege is alleged as to information or materials or if an interrogatory is otherwise not answered in full, state the specific grounds for not answering in full and answer said interrogatory to the extent to which it is not objected, including the identification of all information or materials for which privilege is claimed and the specific nature of any such privilege.

Any word written herein in the singular shall be construed as plural, or vice versa, when necessary to facilitate an inclusive, comprehensive, and exhaustive response to the discovery request.

INTERROGATORIES

INTERROGATORY NO. 1 Identify the Applicant in detail.

INTERROGATORY NO. 2 State:

a. all reasons for the selection of Applicant's Mark;
b. the date on which Applicant's Mark was first conceived;
c. the identity of each person involved in the selection of Applicant's Mark;
d. the identity of each person involved in the decision to use Applicant's Mark;
e. all items that served as inspiration for Applicant's Mark; and
f. all alternative marks considered.

INTERROGATORY NO. 3 Identify:

a. the Applicant's Application;
b. any state or foreign applications of Applicant's Mark; and
c. any other marks used by Applicant.

INTERROGATORY NO. 4 Identify in detail the dates of first use in interstate commerce, if any, of Applicant's Mark in connection with the Applicant's Services.

INTERROGATORY NO. 5 With respect to the use(s), if any, of the Applicant's Mark in connection with the Applicant's Services, identify in detail:

a. Each manner in which the Applicant's Mark has been used and will be used in the future;
b. Whether the offer of each item under the Applicant's Mark has been continuous from each first use date, if any, to the present;
c. If the answer to any portion of this Interrogatory is in the affirmative, state whether the circumstances that are described in the answer prevailed throughout the period beginning on the first use date, if any; and
d. If the circumstances described in the answer to any portion of this Interrogatory did not prevail throughout the period(s) beginning on the first use date, if any, state in detail how they changed.

INTERROGATORY NO. 6 Describe any communications with the USPTO concerning Applicant's Mark.

INTERROGATORY NO. 7 Identify all trademark and domain name searches related to Applicant's Mark and/or the Opposer's Mark.

INTERROGATORY NO. 8 State whether Applicant has the opinion of an attorney regarding the trademark availability of Applicant's Mark. If the answer to this interrogatory is other than a categorical unqualified negative, identify each such opinion.

INTERROGATORY NO. 9 State the factual circumstances of any agreements regarding the use of Applicant's Mark.

INTERROGATORY NO. 10 Identify the factual circumstances of any awareness on the part of Applicant; regarding Opposer, Opposer's Mark, or the Opposer's Application and Registrations.

INTERROGATORY NO. 11 Identify any communications with third parties, other than your counsel, concerning Opposer, Opposer's Mark, or Opposer's Application and Registrations.

INTERROGATORY NO. 12 State all facts related to any matter in which a third party has challenged the rights you have claimed in Applicant's Mark.

INTERROGATORY NO. 13 State all facts related to any matter in which you have challenged the rights of a third party based upon the rights you have claimed to Applicant's Mark.

INTERROGATORY NO. 14 State whether Applicant was aware of Opposer's Mark prior to filing any of the Applicant's Application for registration of any of Applicant's Mark or the use of Applicant's unregistered trademarks. If the answer to this interrogatory is other than a categorical unqualified negative, identify in detail the factual circumstances of any awareness and/or knowledge on the part of Applicant.

INTERROGATORY NO. 15 State the factual circumstances of instances in which Applicant has been aware of any complaint concerning the quality of Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 16 Identify all business analyses related to the use of Applicant's Mark in connection with Applicant's Services.

INTERROGATORY NO. 17 Identify any validation procedure employed by Applicant to determine any confusion between Applicant's Services and the activities in connection with which the Opposer's Mark is used as a mark.

INTERROGATORY NO. 18 Identify the channels of trade for Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 19 Identify the demographics of users of Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 20 Identify the cost to your users of Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 21 Identify the first user, if any, for Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 22 Identify five (5) representative users, if any, of Applicant's Services.

INTERROGATORY NO. 23 Describe the kinds of users that would be considered typical ultimate purchasers of Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 24 For the Applicant's Services provided under Applicant's Mark, state, by calendar year, the revenue associated with such goods and service, from the date such items were first marketed to the present, if any.

INTERROGATORY NO. 25 For the Applicant's Services provided under Applicant's Mark, state, by calendar year, the total cost of marketing Applicant's Services through all forms of media, from the date the items were first marketed to the present, if any.

INTERROGATORY NO. 26 Identify the person(s) with the most knowledge concerning business planning for Applicant's Services provided under Applicant's Mark, from the date such items were first marketed to the present.

INTERROGATORY NO. 27 Identify all third party entities retained by you for marketing Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 28 Identify all individuals that have the most knowledge of the marketing of Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 29 Identify the media outlets through which Applicant has marketed Applicant's Services provided under Applicant's Mark.

INTERROGATORY NO. 30 Describe the marketing of Applicant's Services provided under Applicant's Mark in any medium.

INTERROGATORY NO. 31 State all facts on which Applicant bases its claim that the Opposition, and each claim alleged therein, is barred in whole or part by the equitable doctrine of laches.

INTERROGATORY NO. 32 State all facts on which Applicant bases its claim that the Opposition, and each claim alleged therein, is barred in whole or part by the equitable doctrine of acquiescence.

INTERROGATORY NO. 33 Identify all persons that furnished any information in response to the discovery requests and for each person so identified, indicate the discovery request for which such person furnished information.

Respectfully submitted,

Dated: September 20, 2018

By: /Ramona Prioleau/

Ramona Prioleau
RLP Ventures, LLC
Times Square Station
P.O. Box 2605
New York, NY 10108-2605
rlpvllc@gmail.com

OPPOSER

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the attached Opposer's First Set of Interrogatories to Applicant was served on the Attorney for the Applicant on the date listed below via email:

Winston T. Folmar
Res Nova Law
1455 NW Irving Street, Suite 200
Portland, Oregon 97209
winston@resnovalaw.com,
jia@resnovalaw.com
susan@resnovalaw.com

Dated: September 20, 2018

By: /Ramona Prioleau/
Ramona Prioleau

EXHIBIT C

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

RLP Ventures, LLC Opposer, v. The Skanner Foundation Applicant.	Opposition No. 91241706 Mark: VANPORT MOSAIC Filed: October 2, 2017 Published: February 13, 2018 Application No. 87/630,710

OPPOSER'S FIRST SET OF DOCUMENT REQUESTS

In accordance with Rule 34 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, Opposer RLP VENTURES LLC requests that Applicant THE SKANNER FOUNDATION produce the following documents and/or tangible things for inspection and copying to RLP Ventures, LLC, Times Square Station, P.O. Box 2605, New York, NY 10108 within thirty (30) days of the date of service of this First Request.

The Requests shall be answered in accordance with the Instructions and Definitions set forth below. The full text of the Instructions and Definitions shall be deemed incorporated by reference into each Request.

INSTRUCTIONS

1. These Requests are continuing in nature. Your attention is called to Rule 26(e)(1) of the Federal Rules of Civil Procedure, which provides:

> A party who has made a disclosure under Rule 26(a) - or who has responded to an interrogatory, request for production, or request for admission - must supplement or correct its disclosure or response:
> (A) in a timely manner if the party learns that in some material respect the disclosure or response is incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing.

2. Produce all documents in a form that renders the documents susceptible to copying. Produce all documents as they are kept in the usual course of business or organized and labeled to correspond to the following Requests.

3. If you are unable to comply fully with any Request herein, comply to the extent possible and explain why full compliance is not possible.

4. If any requested document or thing is unavailable because it has been destroyed, identify it (for documents, by date, author, addressee, signatory, subject and length); state when it was destroyed and why; and identify the person who ordered it destroyed.

5. All Requests are directed to material in your possession, custody or control, or within the possession, custody or control of your agents, servants, employees, related companies and attorneys. They are also directed to those firms, corporations, partnerships, or trusts that you control, and to material in the possession, custody or control of employees, agents, friends, trustees, guardians and representatives of such entities.

6. Any requested material that is withheld on the basis of a claim of privilege, work product, or any other ground is to be identified in writing by title, addressee, addresser, date, topic covered, and length. Additionally, Applicant shall provide a statement of the ground alleged for withholding each such document and shall identify all persons who have or have had possession, custody, or control of the document (or any portions thereof).

7. If you object to any Request, identify all grounds for the objection and set forth the factual basis for assertion of the objection.

8. If you object to any portion of a Request, explain your objection and answer the remainder.

DEFINITIONS

The definitions and instructions set forth in Applicant's First Set of Interrogatories are hereby incorporated by reference as though fully set forth herein.

As used herein, the terms "**The Skanner Foundation**," "**you**," and "**your**" refer to Applicant and include any persons controlled by or acting on behalf of that entity, including, without limitation, to all officers, directors, owners, employees, agents, representatives, and attorneys, and any predecessors, subsidiaries, parent companies, affiliated companies, or joint venturers.

As used herein, the term "**Applicant's Mark**" means the mark "VANPORT MOSAIC".

As used herein, the term "**Opposer's Mark**" means the mark "MOSAEC".

As used herein, the term "**Applicant's Application**" means the USPTO Application No. 87/630,710 filed on October 2, 2017.

As used herein, the term "**Applicant's Services**" refers to each of the items set forth in the Applicant's Application.

As used herein, the term "**Opposer's Application and Registrations**" means the USPTO application and registrations:

Registration or US Serial No.	Registration or Application Date
87/226,106	November 4, 2016
87/469,079	May 31, 2017
5,409,856	February 27, 2018
5,284,032	September 12, 2017
5,335,465	November 14, 2017

As used herein, the terms "**bear**" or "**bearing**" in connection with "**designation**," "**mark**," "**Mark**," "**trademark**," or "**trade name**," as in, for example, "**bearing the designation**," or "**bearing the mark**," shall refer to the designation appearing on any goods or on any advertising, marketing materials, displays, or other materials associated with the referenced goods or services, or in any other way used in connection with any goods or services that would be considered "use" under United States trademark law.

As used herein, the terms "**good**" or "**goods**" shall be construed to include a "**service**" or "**services**."

As used herein, the term "**documents**" shall include, without limitation, all "**writings**" or "**photographs**" of any kind, as those terms are defined in Rule 1001(1) and (2) of the Federal Rules of Evidence (hereinafter the "FRE"), including without limitation the "original" of any such documents as that term is defined in FRE 1001(3), drafts, non-identical copies (whether differing from the original by reason of notations made on the copies or otherwise), and any "duplicate" of said documents, as that term is defined in FRE 1001(4), and shall further include, without limitation, the following items, whether printed or recorded, or reproduced by any electronic or mechanical means or process, or written or produced by hand: writings; drawings; graphs, charts; photographs; phone records; correspondence; notes; telegrams; telefaxes,

facsimile transmissions; agreements; drafts of agreements; memoranda; summaries of records of telephone conversations; instructions to employees or independent contractors; opinions; training manuals; reports; field test reports; studies; diaries; plans; brochures; compact discs and all packaging and inserts therefor; advertisements; marketing and promotional materials; specifications; bids; proposals; contracts; trademark applications; trademark registrations; surveys; copyright applications; copyright registrations; patents; patent applications; computer program specifications including input or output specifications; job orders; bills of lading; purchase orders; invoices; material specifications; investigative reports; data compilations from which information can be obtained or translated, if necessary, through detection devices into reasonably useable form; computer programs; source listings; electronic mail; data processing storage media; and computer printouts.

As used herein, the term "**relating to**" shall include, without limitation, referring to, responding to, concerning, connected with, commenting on, arising out of, regarding, discussing, showing, describing, evidencing, reflecting, analyzing, constituting, and forming a basis for.

As used herein, the term "**person**," as well as any pronoun referring thereto, shall include, without limitation, any natural person, group, investigatory body, governmental unit, governmental agency, governmental department, corporation, association, partnership, limited partnership, joint venture, sole proprietorship, business, organization, or institution.

As used herein, the term "**entity**" shall refer to a person, organization, corporation, partnership, business, association, or other enterprise carrying on a trade or business. The term "**communication**" shall refer to the transmittal of information in the form of facts, opinions, ideas, inquiries, or otherwise, whether oral, written or in electronic form.

"**And**" and "**or**" shall be construed disjunctively and/or conjunctively as necessary in order to bring within the scope of the discovery request all possible responses which might otherwise be construed to be outside of its scope.

"**Identify**" when used herein with respect to a person, shall require a response that includes, without limitation:

(i) the person's full name;

(ii) the person's employer, business position, and business address at the relevant time; and
(iii) the person's last known employer, business position, business address, telephone numbers, facsimile number, and email address.

"**Identify**" or "**state**" when used herein with respect to a business entity, shall require a response that includes, without limitation:

(i) the entity's full name;
(ii) the entity's principal place of business;
(iii) the nature or type of entity;
(iv) the state or jurisdiction of incorporation or registration, if applicable; and
(v) the principal business conducted by such entity.

"**Identify**" or "**state**" when used herein with respect to a document or communication, shall require a response that includes, without limitation:

(i) the general character, nature, or type of the document or communication;
(ii) the date of the document or communication, or, if it has no date or the date is uncertain, the approximate date of its preparation or occurrence;
(iii) the title of the document;
(iv) the full name(s) of the author(s) and all addressee(s) and recipient(s) of the document or communication;
(v) a summary of the document's or communication's contents or subject matter;
(vi) the present location and custodian of the document or communication or any copies thereof; and
(vii) a file number or other identifying mark or code, if applicable.

If any document(s) requested to be identified or produced has or have been destroyed, a response shall require the following additional information as to each such document:

(i) the date of destruction of the document;
(ii) the reason(s) for the destruction of the document;
(iii) the identity of the person who destroyed the document; and
(iv) the identity of any person who directed that the document be destroyed.

If any of these discovery requests cannot be answered in full, then respond to the fullest extent possible, specifying the reasons for the inability to respond to the remainder of the discovery request, and state whatever information or knowledge is available concerning the unanswered portion.

If any responsive information, communication or document is withheld on the basis of any claim of privilege or immunity, a response shall require a general description of the substance or subject matter of the information, communication, or document withheld; a

statement of any privilege or immunity being invoked or claimed and the basis therefor; and the identification of all persons who have had access to such information, communication or document. Where applicable, a response shall also require the date of the document and identification of the author or sender, addressee, and all recipients thereof, by name, address, title and business affiliation.

The geographic scope of these requests is the United States, including its territories and possessions, unless otherwise specified.

The following document requests shall be deemed to seek answers as of the date hereof, but shall be deemed to be continuing so that any additional information relating in any way to these document requests which Applicant acquires or which becomes known to Applicant up to and including the time of trial shall be furnished to Opposer immediately after such information is first acquired or becomes known.

In the following document requests, if a privilege is alleged as to information or materials or if an document request is otherwise not answered in full, state the specific grounds for not answering in full and answer said document request to the extent to which it is not objected, including the identification of all information or materials for which privilege is claimed and the specific nature of any such privilege.

Any word written herein in the singular shall be construed as plural, or vice versa, when necessary to facilitate an inclusive, comprehensive, and exhaustive response to the discovery request.

REQUESTS

REQUEST NO. 1: All documents relating to Applicant's corporate status.

REQUEST NO. 2: Documents related to:

a. all reasons for the selection of Applicant's Mark;
b. the date on which Applicant's Mark was first conceived;
c. the identity of each person involved in the selection of Applicant's Mark;

d. the identity of each person involved in the decision to use Applicant's Mark;
e. all items that served as inspiration for Applicant's Mark; and
f. all alternative marks considered.

REQUEST NO. 3: All documents relating to:

a. the Applicant's Application;
b. any other registrations of Applicant's Mark; and
c. any other marks used by Applicant.

REQUEST NO. 4: All documents relating to the dates of first use in interstate commerce, if any, of all of Applicant's Mark in connection with the Applicant's Services.

REQUEST NO. 5: All documents indicating how Applicant:

a. has used the Applicant's Mark prior to the date of this First Set of Document Requests;
b. currently uses the Applicant's Mark; and
c. intends to use the Applicant's Mark in the future,

including business plans.

REQUEST NO. 6: All documents relating to any communications with the USPTO concerning any of Applicant's Mark.

REQUEST NO. 7: All documents concerning any trademark and domain name searches related to Applicant's Mark and/or the Opposer's Mark.

REQUEST NO. 8: All documents related to any opinion of an attorney regarding the trademark availability of Applicant's Mark.

REQUEST NO. 9: All documents relating to any agreements regarding the use of Applicant's Mark.

REQUEST NO. 10: All documents identifying the factual circumstances of any awareness on the part of Applicant, regarding Opposer, Opposer's Mark, or the Opposer's Application and Registrations.

REQUEST NO. 11: All documents relating to any communications with third parties, other than your counsel, concerning Opposer, Opposer's Mark, or Opposer's Application and Registrations.

REQUEST NO. 12: All documents relating to any matter in which a third party has challenged the rights you have claimed in Applicant's Mark.

REQUEST NO. 13: All documents relating to any matter in which you have challenged the rights of a third party based upon the rights you have claimed to Applicant's Mark.

REQUEST NO. 14: All documents relating to Applicant's awareness of Opposer's Mark prior to filing any of the Applicant's Application for registration of Applicant's Mark or the use of Applicant's unregistered trademarks.

REQUEST NO. 15: All documents concerning any complaint concerning the quality of Applicant's Services provided under Applicant's Mark.

REQUEST NO. 16: All documents concerning any business analyses related to the use of Applicant's Mark in connection with Applicant's Services.

REQUEST NO. 17: All documents concerning any validation procedure employed by Applicant to determine any confusion between Applicant's Services and the activities in connection with which the Opposer's Mark is used as a mark.

REQUEST NO. 18: All documents relating to any channels of trade for Applicant's Services provided under Applicant's Mark.

REQUEST NO. 19: All documents which indicate the demographics of users of Applicant's Services provided under Applicant's Mark.

REQUEST NO. 20: All documents sufficient to show the cost to your users of Applicant's Services provided under Applicant's Mark.

REQUEST NO. 21: Documents sufficient to identify the first user, if any, for Applicant's Services provided under Applicant's Mark.

REQUEST NO. 22: Documents identifying five (5) representative users, if any, of Applicant's Services.

REQUEST NO. 23: All documents relating to the kinds of users who would be considered typical ultimate purchasers of Applicant's Services provided under Applicant's Mark.

REQUEST NO. 24: For the Applicant's Services provided under Applicant's Mark, all documents evidencing the revenue associated with such goods and service, from the date such items were first marketed to the present, if any.

REQUEST NO. 25: For the Applicant's Services provided under Applicant's Mark, all documents evidencing the total cost of marketing Applicant's Services through all forms of media, from the date the items were first marketed to the present, if any.

REQUEST NO. 26: All documents evidencing the person(s) with the most knowledge concerning business planning for Applicant's Services provided under Applicant's Mark, from the date such items were first marketed to the present.

REQUEST NO. 27: All documents evidencing all third party entities retained by you for marketing Applicant's Services provided under Applicant's Mark.

REQUEST NO. 28: All documents evidencing all individuals that have the most knowledge of the marketing of Applicant's Services provided under Applicant's Mark.

REQUEST NO. 29: All documents evidencing the media outlets through which Applicant has marketed Applicant's Services provided under Applicant's Mark.

REQUEST NO. 30: All documents evidencing the marketing of Applicant's Services provided under Applicant's Mark in any medium.

REQUEST NO. 31: All documents supporting Applicant's claim that the Opposition, and each claim alleged therein, is barred in whole or part by the equitable doctrine of laches.

REQUEST NO. 32: All documents supporting Applicant's claim that the Opposition, and each claim alleged therein, is barred in whole or part by the equitable doctrine of acquiescence.

REQUEST NO. 33: All documents relating to your policies regarding document retention.

REQUEST NO. 34: All documents requested to be identified in the First Set of Interrogatories.

REQUEST NO. 35: All documents used in responding to the discovery requests.

Respectfully submitted,

Dated: September 20, 2018

By: /Ramona Prioleau/

Ramona Prioleau
RLP Ventures, LLC
Times Square Station
P.O. Box 2605
New York, NY 10108-2605
rlpvllc@gmail.com

OPPOSER

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the attached Opposer's First Set of Document Requests to Applicant was served on the Attorney for the Applicant on the date listed below via email:

Winston T. Folmar
Res Nova Law
1455 NW Irving Street, Suite 200
Portland, Oregon 97209
winston@resnovalaw.com,
jia@resnovalaw.com
susan@resnovalaw.com

Dated: September 20, 2018

By: /Ramona Prioleau/
Ramona Prioleau

EXHIBIT D

Gmail RLP Vent <rlpvllc@gmail.com>

Opposition Number 91241706

RLP Vent <rlpvllc@gmail.com> Thu, Jan 17, 2019 at 8:25 PM
To: bernie@theskanner.com

Applicant's responses to each of:

1. Opposer's First Set of Interrogatories and
2. Opposer's First Set of Document Requests.

in the above-referenced proceeding were due on October 20, 2018.

Please send the Applicant's responses by January 21, 2019. As a courtesy, the original request is provided below.

Regards,

Ramona Prioleau

---------- Forwarded message ---------
From: **RLP Vent** <rlpvllc@gmail.com>
Date: Thu, Sep 20, 2018 at 10:30 PM
Subject: Opposition Number 91241706
To: Winston Folmar <winston@resnovalaw.com>
Cc: Susan Ford <susan@resnovalaw.com>, Jamie Lynn Summerfield <jamielynn@resnovalaw.com>, Jia J. Feng <jia@resnovalaw.com>

Please see attached.

2 attachments

Interrogatories 91241706 09202018.pdf
132K

Production Requests 91241706 09202018.pdf
119K

EXHIBIT E

Gmail

RLP Vent <rlpvllc@gmail.com>

Opposition Number 91241706

1 message

RLP Vent <rlpvllc@gmail.com> Wed, Jan 30, 2019 at 11:37 AM
To: bernie@theskanner.com

Please see attached.

Letter re Failure to Respond to Discovery Requests 01302019.pdf
105K

mosaec a hip, eclectic, cultural mélange

January 30, 2019

Bernie Foster
The Skanner Foundation
415 N Killingsworth Street
Portland, OR 97217

Re: Opposition No. 91241706 Opposer's First Set of Interrogatories and First Set of Document Requests

Dear Mr. Foster:

I write on behalf of RLP Ventures, LLC ("Opposer") to address The Skanner Foundation's ("Applicant") failure to submit responses to Opposer's First Set of Interrogatories ("Interrogatories") and First Set of Document Requests ("Document Requests" and together with the Interrogatories, the "Discovery Requests").

Opposer served Applicant with Discovery Requests on September 20, 2018. Applicant's responses to the Discovery Requests were due on October 20, 2018.

Please promptly respond to the Discovery Requests and provide all responsive documents and information so that we are in receipt of the same by the close of business on February 1, 2019. To the extent that you are unable or unwilling to do so, please let me know by February 1, 2019.

Opposer reserves the right to seek all remedies available to it under the law and seek appropriate relief under the Federal Rules of Civil Procedure.

Sincerely,

/s/Ramona Prioleau
Ramona Prioleau
RLP Ventures, LLC
Founder

EXHIBIT F

Gmail **RLP Vent <rlpvllc@gmail.com>**

Opposition Number 91241706

1 message

RLP Vent <rlpvllc@gmail.com> Wed, Jan 30, 2019 at 12:14 PM
To: bernie@theskanner.com

Dear Mr. Foster:

Applicant's Initial Disclosures were due on 9/18/2018 in the above-referenced proceeding.

Please send the Applicant's Initial Disclosures by close of business on February 1, 2019.

Opposer reserves the right to seek all remedies available to it under the law and seek appropriate relief under the Federal Rules of Civil Procedure.

Regards,

Ramona Prioleau