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

Proceeding	91251609
Party	Defendant Husnain Alamdar
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Submission	Other Motions/Papers
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Date	01/31/2020
Attachments	Applicant Alamdars Initial Disclosures 2020.01.31.pdf(225393 bytes)

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

Burberry Limited,)	
)	
Opposer)	Opposition No. 91251609
)	
v.)	
)	
Husnain Alamdar,)	
)	
Applicant)	
)	

APPLICANT’S INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26 (a) (1)

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and 37 C.F.R. Sections 2.120(a)(2)(ii) and (3), Applicant hereby submits its initial disclosures. These initial disclosures are based on the information reasonably available to Applicant at this time and are made without waiving any objections as to relevance, materiality, or admissibility of evidence in the action. Applicant reserves the right to revise, correct, supplement or clarify the disclosures at any time, consistent with Rule 26(e) of the Federal Rules of Civil Procedure.

1. The following individual is likely to have discoverable information that Applicant may use to support its claims and defenses in this proceeding:

NAME	POSITION	CONTACT INFORMATION	SUBJECT MATTER
Husnain Alamdar	Owner	2675 East Stearns Street, Brea, CA 92821 909-551-5297	Creation, application, marketing, promotion, planned and actual uses and other information related to the Applicant’s business and brand(s).

In providing this information, Applicant is not waiving any applicable privilege or work product protection and no current employee or consultant of Applicant should be contacted without the prior consent of Applicant’s counsel. Applicant expressly reserves the

right to identify and to call as witnesses additional persons if, during the course of discovery and investigation related to this case, Applicant learns that such additional persons have relevant knowledge.

2. Applicant identifies the following documents, electronically stored information or tangible things in its personal possession, custody or control that it may use to support its claims or defenses by category:

- Documents associated with federal and/or state trademark applications and registrations for the Applicant's BT (logo design) mark.
- USPTO records related to trademark applications and registration for BT, TB, and similar marks in plain and stylized form.
- Documents reflecting the creation and first use of the Applicant's mark.
- Documents reflecting the goods and/or related services in connection with which the Applicant and certain other known parties use the mark and the relevant markets for those goods and services.
- Advertising and promotional materials.
- Documents reflecting the respective trade channels of the parties' goods and/or related services.
- Correspondence between the parties, and between the parties and third parties.
- Relevant agreements and/or business arrangements.

3. In addition, Applicant anticipates that other, unknown individuals may have discoverable information that Applicant may use to support his claims or defenses. Applicant incorporates by reference any other individuals disclosed by other parties in this matter and reserves the right to supplement this disclosure pursuant to Federal Rule of Civil Procedure 26(e). Applicant also reserves the right to obtain discovery in support of his claims or defenses from any witness identified in any other party's Rule 26(a)(1) disclosure.

Dated: New York, New York
January 31, 2020

By:

/Christine C. Washington/

Christine C. Washington, Esq.
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New York, NY 10001
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the APPLICANT'S INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26 (a) (1) was served upon Opposer's counsel by E-mail with confirmation copies being sent by First Class mail, postage pre-paid on this 31st day of January in the year 2020, to the following address:

Andrea L. Calvaruso
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Dated: New York, NY
January 31, 2020

By /Christine C. Washington, Esq./

