

ESTTA Tracking number: **ESTTA1139251**

Filing date: **06/09/2021**

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

Proceeding	91263503
Party	Plaintiff Tetra Gmbh, Spectrum Brands Pet LLC
Correspondence Address	MICHELLE L. ZIMMERMANN LEYDIG, VOIT & MAYER, LTD. TWO PRUDENTIAL PLAZA, 180 N. STETSON AVE SUITE 4900 CHICAGO, IL 60601 UNITED STATES Primary Email: mzimmermann@leydig.com Secondary Email(s): sferraro@leydig.com 312-616-5600
Submission	Motion for Sanctions (Other)
Filer's Name	Stella M. B. Ferraro
Filer's email	sferraro@leydig.com, mzimmermann@leydig.com
Signature	/Stella M. B. Ferraro/
Date	06/09/2021
Attachments	2021-06-09 - Opposers Motion for Sanctions - 743423.pdf(244310 bytes) 743423 - Exhibit A.pdf(169789 bytes) 743423 - Exhibit B.pdf(174690 bytes) 743423 - Exhibit C.pdf(234870 bytes) 743423 - Exhibit D.pdf(239642 bytes) 743423 - Exhibit E.pdf(249992 bytes) 743423 - Exhibit F.pdf(230426 bytes)

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

Spectrum Brands Pet LLC,)	
)	
and)	
)	
Tetra GmbH,)	
)	Opposition No. 91263503
Opposers)	
)	Serial No. 88/321,368
v.)	
)	
Dzmitry Sidarevich,)	
)	
Applicant)	

OPPOSERS’ MOTION FOR SANCTIONS

Pursuant to 37 C.F.R. § 2.120(h)(2) and TBMP § 527.01(b), and in the alternative, pursuant to 37 C.F.R. § 2.120(h) and TBMP § 527.01(a), Opposers, Spectrum Brands Pet LLC and Tetra GmbH, request the Board issue sanctions against Applicant, Dzmitry Sidarevich, in the form of entering judgment against Applicant based on his failure to participate further in this proceeding. Applicant’s counsel expressly informed Opposers’ counsel that Applicant did not intend to continue with the proceeding. Based on the same, Opposers have attempted, in good faith, on multiple occasions and without success, to contact Applicant’s counsel to properly terminate the proceeding, thus prompting Opposers’ filing of this Motion for Sanctions.

I. Background

On July 8, 2020, Opposers filed a Joint Notice of Opposition against Applicant’s application, Application Serial No. 88321368, for the mark VETRAPET & Design (hereinafter “the Application”). Applicant’s Answer was due August 17, 2020. Due to

Applicant's failure to file an Answer in the proceeding, the Board issued a Notice of Default on August 28, 2020. On September 28, 2020, Applicant filed his Answer along with a motion requesting the Board set aside the Notice of Default and resume the proceeding. Opposers filed a brief in response to Applicant's motion on October 19, 2020, and the Board granted Applicant's motion on January 19, 2021.

II. Legal Standard

A motion for sanctions is appropriate, in part, where a party expressly informs another party that it will no longer participate in a proceeding, thereby leading to the initial party no longer engaging in the proceeding and disregarding deadlines and procedure, including but not limited to, by not engaging in conferences, exchanging documents, or providing other information requested. *See* TBMP § 527.01(b). Sanctions are also appropriate where "a party refuses to participate in a discovery conference under 37 C.F.R. § 2.120". *See* TBMP § 527.01(a).

III. Argument

Applicant has refused to participate further in this proceeding, thereby preventing the proceeding from either substantively moving forward, or being terminated in any way other than through Board Order. Specifically, based on the Board's previous resumption of the proceeding, Applicant and Opposers' (hereinafter collectively "the Parties") Discovery Conference deadline was February 5, 2021. Opposers reached out to Applicant's counsel multiple times in advance of this deadline to schedule the conference (see Exhibit A attached hereto, showing correspondence relating to scheduling the conference). On February 2, 2021, Applicant's counsel responded to Opposers' latest reminder by informing Opposers that his client informed him that "they will be abandoning the defense of this matter and will be

abandoning the application in question. As such, it appears that no discovery conference will be necessary” (see Exhibit B attached hereto, containing correspondence from Applicant’s counsel). Based on this information, and on the same day, Opposer requested confirmation that Applicant would promptly be filing a motion to abandon the Application, thereby allowing the proceeding to be terminated. Opposers did not receive a response, and after sending a reminder which still elicited no response, on February 19, 2021, Opposers informed Applicant’s counsel that, given Applicant appeared unwilling to file a motion to withdraw the Application, the Parties must proceed with the Discovery Conference (see Exhibit C attached hereto). In response to this correspondence, also on February 19, Applicant’s counsel informed Opposers’ counsel that “I don’t want you to waste resources on your clients behalf on your end. Let me call the client real quick maybe I’ll get him to sign off on the withdrawal of the application today tomorrow, so that it will spare you the effort of continuing with the opposition” (see Exhibit D attached hereto).

Based on the above exchange, Opposers allowed Applicant additional time to proceed with filing a motion to withdraw the Application. However, after noting a motion had not been filed, and after receiving no further correspondence from the other side, Opposers sent a status inquiry to Applicant’s counsel on February 25, 2021. In response, Applicant’s counsel informed Opposers’ counsel that Applicant was withdrawing, and that he was waiting for his client to return the signed withdrawal document. He further stated that, in light of the same, there was “no need for discovery conference participation on [his] end” (see Exhibit E). Based on this further information, Opposers’ counsel requested confirmation whether Applicant would agree to a 30-day suspension of the proceeding to pause the deadlines while Applicant worked on filing the motion to withdraw the Application. Opposers’ counsel sent

this correspondence on February 26, 2021, and after having sent various reminders to Applicant's counsel in March and April, including lastly calling and leaving a message for Applicant's counsel on April 16, 2021, Opposer still has not received any further communication from Applicant's counsel regarding this matter (see Exhibit F).

Despite the presence and passing of various proceeding deadlines, including the Discovery Conference and Initial Disclosures deadlines thus far, Applicant appears to have abandoned his defense of this opposition. Based on Applicant's counsel's express previous statement that Applicant would be abandoning defense of the Application in this proceeding, combined with Applicant's counsel's above-discussed actions (or lack thereof), Opposers understand that Applicant will not proceed further in this proceeding, including by not participating in the discovery portion of the proceeding, which is set to close August 4, 2021. In light of the same, sanctions should be entered against Applicant, including in the form of entering judgment against Applicant. Opposers acknowledge that judgment is a harsh remedy, but "it is justified where there is a strong showing of willful evasion and no less drastic remedy would be effective." See *Fifth Generation Inc. v. Titomirov Vodka LLC*, 2019 U.S.P.Q.2d 418666, 2019 BL 418666 at Pg. 5 (T.T.A.B. 2019) (Board granted opposer-petitioner's motion for sanctions in form of judgment against applicant-registrant where applicant-registrant willfully evaded its discovery obligations). Here, Applicant has willfully evaded participating further in the proceeding, including, but not limited to, by ignoring Opposers' various attempts to reach Applicant's counsel, never participating in the Discovery Conference, and making no effort to participate in the current discovery phase of the proceeding.

IV. Conclusion

Given Applicant's express statement that he would be abandoning defense of the Application, and Applicant's disregard for proceeding deadlines and procedure, including, but not limited to, participating in the Discovery Conference, exchanging Initial Disclosures, or participating in the discovery phase thus far, Opposers respectfully request the Board issue sanctions against Applicant in the form of entering judgment against Applicant based on his failure to participate further in this proceeding.

Respectfully submitted,


Date: June 9, 2021

By: 

Michelle L. Zimmermann
Stella M. B. Ferraro
LEYDIG, VOIT & MAYER, LTD.
Two Prudential Plaza, 180 N. Stetson Ave.
Suite 4900
Chicago, Illinois 60601-6745
(312) 616-5600
Attorneys for Opposers

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that a copy of this attached OPPOSERS' MOTION FOR SANCTIONS was filed electronically with the Trademark Trial and Appeal Board on June 9, 2021.


Stella M. B. Ferraro

CERTIFICATE OF SERVICE

I hereby certify that a copy of this attached OPPOSERS' MOTION FOR SANCTIONS was served upon the following individual by email on June 9, 2021:

Sergei Orel, Esq.
2125 Center Avenue, Suite 616
Fort Lee, NJ 07024
sergeiorel@yahoo.com
sorel@sergei-orel.com

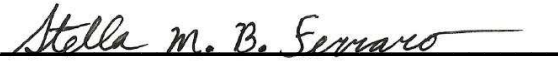

Stella M. B. Ferraro

Exhibit A

From: [Zimmermann, Michelle L](#)
To: sorel@sergei-orel.com
Cc: [Surber, Robin](#); [Ferraro, Stella](#)
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)
Date: Tuesday, February 2, 2021 11:19:20 AM

Dear Mr. Orel,

Our discovery conference deadline is this Friday. Please advise if you have time tomorrow afternoon to meet for this Board-required conference.



Michelle L. Zimmermann

Partner | Leydig, Voit & Mayer, Ltd.
180 North Stetson, Suite 4900 | Chicago, IL 60601-6745
voice: + 1 312 616 5600 | facsimile: + 1 312 616 5700
mzimmermann@leydig.com | www.leydig.com

The information contained in this communication is confidential and may contain information that is privileged and/or exempt from disclosure under applicable law. If you have received this communication in error, please notify me immediately and delete the original and all copies of this communication. Thank you.

From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Friday, January 29, 2021 1:50 PM
To: sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Kind reminder

From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Wednesday, January 27, 2021 10:28 AM
To: sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Dear Mr. Orel,

We look forward to your proposed times for a Discovery Conference either February 1 or the afternoon of February 3.



Michelle L. Zimmermann

Partner | Leydig, Voit & Mayer, Ltd.
180 North Stetson, Suite 4900 | Chicago, IL 60601-6745
voice: + 1 312 616 5600 | facsimile: + 1 312 616 5700
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From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Wednesday, January 20, 2021 5:02 PM
To: sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Dear Mr. Orel,

In light of the Board's recent Order, and the February 5, 2021 Discovery Conference deadline, we are writing to inquire regarding your availability for the Conference. Please let us know if you are available for a call anytime on Monday, February 1, 2021, or the afternoon of Wednesday, February 3, 2021.

We look forward to hearing from you.



Michelle L. Zimmermann

Partner | Leydig, Voit & Mayer, Ltd.
180 North Stetson, Suite 4900 | Chicago, IL 60601-6745
voice: + 1 312 616 5600 | facsimile: + 1 312 616 5700
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Exhibit B

From: [Sergei Orel](#)
To: [Zimmermann, Michelle L](#); sorel@sergei-orel.com
Cc: [Surber, Robin](#); [Ferraro, Stella](#)
Subject: Re: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)
Date: Tuesday, February 2, 2021 12:36:37 PM

Dear Michelle - my clients have informed me that they will be abandoning the defense of this matter and will be abandoning the application in question. As such, it appears that no discovery conference will be necessary.

Sergei

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, February 2, 2021, 12:19 PM, Zimmermann, Michelle L <mzimmermann@leydig.com> wrote:

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We look forward to hearing from you.



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Exhibit C

From: [Zimmermann, Michelle L](#)
To: [Sergei Orel](#); sorel@sergei-orel.com
Cc: [Surber, Robin](#); [Ferraro, Stella](#)
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)
Date: Friday, February 19, 2021 4:17:35 PM

Dear Sergei,

As it appears your client is not willing to affirmatively withdraw the application, we are forced to move forward with the opposition. Thus, please advise as to your availability next week for a Discovery Conference to meet the Board's obligations. Alternatively, please let us know if you will not be participating in a Discovery Conference in this matter.



Michelle L. Zimmermann

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From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Thursday, February 11, 2021 12:00 PM
To: [Sergei Orel](mailto:sergeiorel@yahoo.com) <sergeiorel@yahoo.com>; sorel@sergei-orel.com
Cc: [Surber, Robin](mailto:rsurber@leydig.com) <rsurber@leydig.com>; [Ferraro, Stella](mailto:sferraro@leydig.com) <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Reminder – please confirm your client will file the appropriate motion to abandon. Otherwise, we will need to move forward with our discovery conference and discovery.



Michelle L. Zimmermann

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From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Tuesday, February 2, 2021 4:29 PM
To: [Sergei Orel](mailto:sergeiorel@yahoo.com) <sergeiorel@yahoo.com>; sorel@sergei-orel.com
Cc: [Surber, Robin](mailto:rsurber@leydig.com) <rsurber@leydig.com>; [Ferraro, Stella](mailto:sferraro@leydig.com) <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No.

91263503 (Leydig Ref: 743423)

Dear Sergei,

Thank you for your below correspondence. In light of the same, please confirm that your client will be promptly filing a motion to abandon the application, thereby allowing the opposition proceeding to be terminated accordingly.

We look forward to hearing from you.



Michelle L. Zimmermann

Partner | Leydig, Voit & Mayer, Ltd.

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From: Sergei Orel <sergeiorel@yahoo.com>

Sent: Tuesday, February 2, 2021 12:36 PM

To: Zimmermann, Michelle L <mzimmermann@leydig.com>; sorel@sergei-orel.com

Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>

Subject: Re: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Dear Michelle - my clients have informed me that they will be abandoning the defense of this matter and will be abandoning the application in question. As such, it appears that no discovery conference will be necessary.

Sergei

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, February 2, 2021, 12:19 PM, Zimmermann, Michelle L <mzimmermann@leydig.com> wrote:

Dear Mr. Orel,

Our discovery conference deadline is this Friday. Please advise if you have time tomorrow afternoon to meet for this Board-required conference.

Exhibit D

From: [Sergei Orel](#)
To: [Zimmermann, Michelle L](#); sorel@sergei-orel.com
Cc: [Surber, Robin](#); [Ferraro, Stella](#)
Subject: Re: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmityr Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)
Date: Friday, February 19, 2021 4:41:33 PM

Hi Michelle. I don't want you to waste resources on your clients behalf on your end. Let me call the client real quick maybe I'll get him to sign off on the withdrawal of the application today tomorrow, so that it will spare you the effort of continuing with the opposition.

[Sent from Yahoo Mail for iPhone](#)

On Friday, February 19, 2021, 5:17 PM, Zimmermann, Michelle L <mzimmermann@leydig.com> wrote:

Dear Sergei,

As it appears your client is not willing to affirmatively withdraw the application, we are forced to move forward with the opposition. Thus, please advise as to your availability next week for a Discovery Conference to meet the Board's obligations. Alternatively, please let us know if you will not be participating in a Discovery Conference in this matter.



Michelle L. Zimmermann

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To: Sergei Orel <sergeiorel@yahoo.com>; sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmityr Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Exhibit E

From: [Sergei Orel](#)
To: [Zimmermann, Michelle L](#); sorel@sergei-orel.com
Cc: [Surber, Robin](#); [Ferraro, Stella](#)
Subject: Re: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)
Date: Thursday, February 25, 2021 10:16:16 PM

I am waiting for the client to return to me his signed application to withdraw. He is withdrawing.

Sergei

[Sent from Yahoo Mail for iPhone](#)

On Thursday, February 25, 2021, 10:06 PM, Zimmermann, Michelle L <mzimmermann@leydig.com> wrote:

Dear Sergei,

We are still awaiting your client's action in this matter. We ask that you would please confirm whether or not you intend to comply with the Board's order for a Discovery Conference, given it appears your client is not withdrawing.



Michelle L. Zimmermann

Partner | Leydig, Voit & Mayer, Ltd.
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From: Sergei Orel <sergeiorel@yahoo.com>
Sent: Friday, February 19, 2021 4:41 PM
To: Zimmermann, Michelle L <mzimmermann@leydig.com>; sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: Re: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

From: [Sergei Orel](#)
To: [Zimmermann, Michelle L](#); sorel@sergei-orel.com
Cc: [Surber, Robin](#); [Ferraro, Stella](#)
Subject: Re: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)
Date: Thursday, February 25, 2021 10:18:20 PM

In view of my previous email - no need for discovery conference participation on my end.

Sergei

[Sent from Yahoo Mail for iPhone](#)

On Thursday, February 25, 2021, 10:06 PM, Zimmermann, Michelle L <mzimmermann@leydig.com> wrote:

Dear Sergei,

We are still awaiting your client's action in this matter. We ask that you would please confirm whether or not you intend to comply with the Board's order for a Discovery Conference, given it appears your client is not withdrawing.



Michelle L. Zimmermann

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To: Zimmermann, Michelle L <mzimmermann@leydig.com>; sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: Re: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Exhibit F

From: [Zimmermann, Michelle L](#)
To: [Sergei Orel](#); sorel@sergei-orel.com
Cc: [Surber, Robin](#); [Ferraro, Stella](#)
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)
Date: Friday, April 2, 2021 12:33:22 PM

Final reminder

Dear Sergei,

If we do not receive a response from you either (a) withdrawing your client's application or (b) setting a date for the parties' discovery conference by April 7, 2021, we will be forced to recommend our client take steps to protect its rights and press forward with this opposition.

Michelle L. Zimmermann | mzimmermann@leydig.com | (312) 616-5717

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From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Thursday, March 25, 2021 2:24 PM
To: Sergei Orel <sergeiorel@yahoo.com>; sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Third reminder, please confirm if your client is withdrawing the application or if we need to press forward with a discovery conference. If you will not participate in a discovery conference, please let us know as soon as possible.

Michelle L. Zimmermann | mzimmermann@leydig.com | (312) 616-5717

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From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Monday, March 15, 2021 1:26 PM
To: Sergei Orel <sergeiorel@yahoo.com>; sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Second reminder

From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Thursday, March 4, 2021 11:12 AM

To: Sergei Orel <sergeiorel@yahoo.com>; sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Sergei, please confirm if we are suspending these proceedings while your client decides if it will withdraw the application, or if we need to proceed.

Michelle L. Zimmermann | mzimmermann@leydig.com | (312) 616-5717

The information contained in this communication is confidential and may contain information that is privileged and/or exempt from disclosure under applicable law. If you have received this communication in error, please notify me immediately and delete the original and all copies of this communication. Thank you.

From: Zimmermann, Michelle L <mzimmermann@leydig.com>
Sent: Friday, February 26, 2021 11:11 AM
To: Sergei Orel <sergeiorel@yahoo.com>; sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: RE: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

Dear Sergei,

Thank you for those updates. In light of the pending withdrawal, would your client agree to a suspension of the proceedings to hold the other deadlines in abeyance? We propose a 30-day suspension. Please confirm you agree and we can file the motion.

Michelle L. Zimmermann | mzimmermann@leydig.com | (312) 616-5717

The information contained in this communication is confidential and may contain information that is privileged and/or exempt from disclosure under applicable law. If you have received this communication in error, please notify me immediately and delete the original and all copies of this communication. Thank you.

From: Sergei Orel <sergeiorel@yahoo.com>
Sent: Thursday, February 25, 2021 10:17 PM
To: Zimmermann, Michelle L <mzimmermann@leydig.com>; sorel@sergei-orel.com
Cc: Surber, Robin <rsurber@leydig.com>; Ferraro, Stella <sferraro@leydig.com>
Subject: Re: Tetra GmbH and Spectrum Brands Pet LLC v. Dzmitry Sidarevich - U.S. Opposition No. 91263503 (Leydig Ref: 743423)

In view of my previous email - no need for discovery conference participation on my end.

Sergei

[Sent from Yahoo Mail for iPhone](#)

On Thursday, February 25, 2021, 10:06 PM, Zimmermann, Michelle L <mzimmermann@leydig.com> wrote: