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

Proceeding	91263587
Party	Plaintiff The Wonderful Comapny LLC
Correspondence Address	DANIELLE M CRIONA ROLL LAW GROUP PC 11444 WEST OLYMPIC BLVD, 7TH FLOOR LOS ANGELES, CA 90064 UNITED STATES Primary Email: danielle.criona@roll.com Secondary Email(s): ipdocketing@roll.com 310-966-8771
Submission	Motion to Amend Pleading/Amended Pleading
Filer's Name	Michael M. Vasseghi
Filer's email	Michael.vasseghi@roll.com, ipdocketing@roll.com
Signature	/ Michael M. Vasseghi /
Date	11/19/2020
Attachments	Barnett - Motion.pdf(93018 bytes) Barnett - Declaration of Vasseghi.pdf(458670 bytes)

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

THE WONDERFUL COMPANY LLC,

Opposer,

v.

KEVIN BARNETT,

Applicant.

Opposition No. 91263587

**MOTION FOR LEAVE
TO AMEND NOTICE OF OPPOSITION AND SUPPORTING MEMORANDUM**

I. INTRODUCTION

Opposer THE WONDERFUL COMPANY LLC ("Opposer") hereby moves for an order, pursuant to 37 C.F.R. § 2.107, TBMP § 507 and Fed. R. Civ. P. 15(a), granting Opposer leave to amend its Notice of Opposition to assert as an additional ground of opposition that Applicant KEVIN BARNETT ("Applicant" or "Barnett") lacked a bona fide intent to use his claimed mark in commerce at the time he filed Application Serial No. 88287058 (the "Application") with the United States Patent and Trademark Office.

As grounds for the motion to amend, Opposer recently provided discovery responses establishing that at the time that Applicant filed his intent-to-use Application, he did not, in fact, have a bona fide intent to use the applied-for mark in commerce for the goods set forth in the Application. Accordingly, Opposer seeks leave to amend the Notice of Opposition to assert an additional ground of relief.

Opposer further requests that the proceeding be suspended pending the Board's consideration of the motion and that the parties' pre-trial disclosures and testimony periods be reset once the Board decides the motion.

II. BACKGROUND

The facts on which the motion is based are set forth fully in the accompanying Declaration of Michael Vasseghi ("Vasseghi Decl.") and are summarized briefly here for the Board's convenience.

Opposer initiated this proceeding by filing a Notice of Opposition on July 14, 2020, against the intent-to-use application of Applicant, to register the mark WONDERLAND FARMS ("Applicant's Mark") in Class 31 for "fruit, fresh; vegetables, fresh; fresh edible fungi". [TTABVUE 1]

Opposer propounded written discovery on Applicant. Vasseghi Decl., ¶¶ 2, 3 and Exs. A & B thereto. On November 16, 2020, Opposer received Applicant's verified interrogatory responses as well as responses to the request for the production of documents. Vasseghi Decl., ¶¶ 3,4 and Exs. C & D thereto.¹ Applicant's discovery responses indicate that he had no intent to use the mark in commerce at the time he filed his application for WONDERLAND FARMS. Applicant failed to produce a single document in response to Opposer's document requests, evidencing his intent to sell any product bearing the WONDERLAND FARMS mark. Applicant has no documents to show packaging material or labels, promotional or advertising material intended to be used, documents evidencing how the mark is used in commerce, or documents showing channels of trade. See Exs. B & D to Vasseghi Decl.

¹ Applicant had previously served unverified interrogatory responses and incomplete responses to requests for documents. (Vasseghi Decl. ¶ 5.)

Based on Applicant's discovery responses, Opposer believes that it has an additional valid basis for opposition in that the Applicant did not have a bona fide intention to use Applicant's Mark as of the date that he filed the Application asserting a bona fide intent to use.

III. ARGUMENT

The liberal amendment standards of Rule 15 of the Federal Rules of Civil Procedure are satisfied here. “If the underlying facts or circumstances relied upon by an Opposer may be a proper subject of relief, he ought to be afforded an opportunity to test her claims on the merits.” *Foman v. Davis*, 331 U.S. 178, 182 (1962). “Pleadings in an opposition proceeding may be amended in the same manner and to the same extent as in a civil action in a United States district court.” 37 C.F.R. § 2.107. Pursuant to Fed. R. Civ. P. 15(a), leave to amend “shall be freely given when justice so requires.” Consistent with the standard, the Board “has recognized that ‘amendments to pleadings should be allowed with great liberality at any stage of the proceeding where necessary to bring about a furtherance of justice unless it is shown that entry of the amendment would violate settled law or be prejudicial to the rights of any opposing parties.’” *Commodore Elecs. Ltd. v. CBM Kabushiki Kaisha*, 26 U.S.P.Q.2d 1503, 1505 (TTAB 1993) (quoting *American Optical Corp. v. American Olean Tile Co., Inc.*, 168 U.S.P.Q. 471, 473 (TTAB 1971)). See also *Polaris Indus. v. DC Comics*, 59 U.S.P.Q.2d 1798, 1799 (TTAB 2001); *Boral Ltd. v. FMC Corp.*, 59 U.S.P.Q.2d 1701 (TTAB 2000).

In the present case, the amendment is plainly in keeping with existing law, which recognizes that “the absence of any documentary evidence on the part of the applicant regarding [its claimed intent to use] is sufficient to prove the applicant lacks a bona fide intention to use its mark in commerce [at the time it filed its intent to use application] as required by Section 1 (b)” of the Trademark Act, 15 U.S.C. 1051(b). *Commodore Elecs. Ltd.*, 26 U.S.P.Q.2d at 1507; see

also *Boston Red Sox Baseball Club LP v. Sherman*, 88 U.S.P.Q.2d 1581, 1587 (TTAB 2008).

Indeed, the facts here fall squarely within the decisions issued by the Board in *Commodore Elecs. Ltd.* and *Boston Red Sox Baseball Club*.

In *Commodore Elecs. Ltd.*, the opposer sought leave to amend its notice of opposition after it learned through discovery that the applicant “did not have a single document to establish a bona fide intention to use [its mark] in commerce.” 26 U.S.P.Q.2d at 1504. Rejecting the applicant's argument that such an allegation failed to state a claim upon which relief could be granted, the Board ruled that, in accord with an “objective good-faith test to establish that an applicant's intent is genuine,” the opposer stated a valid claim that would survive scrutiny under Rule 12(b)(6) of the Federal Rules of Civil Procedure. *Id.* at 1506-07. The Board held that if the opposer could show that the applicant possessed no documentary evidence of a bona fide intent to use, absent a compelling justification by the applicant, the opposer would succeed on its claim. *Id.* at 1507.

Similarly, in *Boston Red Sox*, the Board granted leave to amend the pleadings to add a claim for lack of a bona fide intent to use the mark after discovery indicated that there were no supporting documents for such an intent and ultimately found that the opposer had established the ground on that basis. 88 U.S.P.Q.2d at 1587.

Similar facts warrant the same outcome here. Despite specific document requests, Applicant has produced no documents whatsoever that would demonstrate a bona fide intent to use Applicant's mark in commerce.

Moreover, Applicant can make no claim of prejudice based on the assertion of the new ground for opposition. Opposer has acted diligently and promptly in seeking such amendment. Discovery is still open, however, because the facts relating to the additional ground of opposition

relate solely to Applicant's own intentions, there is no additional discovery required on its part and there is no undue burden imposed by the amendment. Given the absence of prejudice to Applicant, the motion to amend should be granted. See, *Polaris Industries Inc. v. DC Comics*, 59 U.S.P.Q.2d 1800, *1 (TTAB 2000); *United States Olympic Committee v. O-M Bread Inc.*, 26 U.S.P.Q.2d 1221, 1223 (TTAB 1993). Accordingly, consistent with the Federal Rules' liberal policy requiring that leave to amend be "freely given," Fed. R. Civ. P. 15(a), the amendment should be permitted.

Furthermore, Opposer requests that the proceeding be suspended pending the Board's consideration of the motion and that the parties' pre-trial and testimony periods be reset once the motion is decided by the Board. As noted, discovery has closed and there is no need for further discovery since any relevant information would be in the sole knowledge of the Applicant.

IV. CONCLUSION

For the foregoing reasons, Opposer respectfully requests that the Board issue an order granting Opposer leave to file an Amended Notice of Opposition in the form attached as Exhibit E to Vasseghi Decl.

DATED: November 19, 2020

THE WONDERFUL COMPANY LLC

By: /s/ MICHAEL M. VASSEGHI

MICHAEL M. VASSEGHI
DANIELLE M. CRIONA
ROLL LAW GROUP PC
11444 West Olympic Boulevard
Los Angeles, California 90064-1557
Telephone: (310) 966-8400
Facsimile: (310) 966-8810
michael.vasseghi@roll.com
ipdocketing@roll.com
Attorneys for Opposer

CERTIFICATE OF SERVICE

I, Susan Bryant, hereby certify that a copy of this MOTION FOR LEAVE TO AMEND NOTICE OF OPPOSITION AND SUPPORTING MEMORANDUM has been served upon attorney for Applicant:

KEVIN BARNETT
31922 FOXMOOR CT
WESTLAKE VILLAGE, CA 91361
Email: kwb12345c@gmail.com; akbar2240@gmail.com
Phone: 818-540-8087

by email on this 19th day of November, 2020.

/s/ Susan Bryant

Susan Bryant
ROLL LAW GROUP PC
11444 West Olympic Boulevard
Los Angeles, California 90064-1557
Telephone: (310) 966-8400
Facsimile: (310) 966-8810

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

THE WONDERFUL COMPANY LLC,

Opposer,

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KEVIN BARNETT,

Applicant.

Opposition No. 91263587

**DECLARATION OF MICHAEL M. VASSEGGI IN SUPPORT OF MOTION FOR
LEAVE TO AMEND NOTICE OF OPPOSITION**

I, Michael M. Vasseghi, declare as follows:

1. I am Senior Counsel at Roll Law Group PC and counsel for The Wonderful Company LLC (“Opposer”). I have personal knowledge of the facts set forth herein and, if called upon to testify, could and would competently testify thereto. I submit this declaration in support of Opposer’s Motion For Leave To Amend Notice Of Opposition And Supporting Memorandum.

2. I propounded requests for documents and interrogatories on Applicant Kevin Barnett. True and correct copies of these discovery requests are attached hereto as Exhibits A & B.

3. On November 16, 2020 Applicant served verified interrogatory responses. A true and correct copy of this response is attached hereto as Exhibit C.

4. On November 16, 2020 Applicant served revised and complete responses to Opposer’s requests for production of documents. A true and correct copy of this response is attached hereto as Exhibit D.

5. Prior to November 16, 2020 Applicant had provided discovery responses.

However, the responses to interrogatories were not verified and the document request responses were incomplete in that there was no response to requests 1, 2, and 14 through 39.

6. A copy of Opposer's proposed Amended Notice of Opposition is attached hereto as Exhibit E.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in Los Angeles, California on November 19, 2020.

/s/ Michael M. Vasseghi
Michael M. Vasseghi

EXHIBIT A

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

THE WONDERFUL COMPANY LLC,

Opposer,

v.

KEVIN BARNETT,

Applicant.

Opposition No. 91263587

**OPPOSER’S THE WONDERFUL COMPANY LLC’S FIRST SET OF
INTERROGATORIES TO APPLICANT KEVIN BARNETT**

PROPOUNDING PARTY: OPPOSER THE WONDERFUL COMPANY LLC

RESPONDING PARTY: APPLICANT KEVIN BARNETT

SET NO.: ONE

In accordance with Rule 33 of the Federal Rules of Civil Procedure, and Rules 2.116 and 2.120 of the Trademark Rules of Practice, Opposer THE WONDERFUL COMPANY LLC (“Opposer”), requests that Applicant KEVIN BARNETT (“Applicant”) answer each of the interrogatories set forth below.

DEFINITIONS AND INSTRUCTIONS

As used herein, unless the context in which it appears clearly suggests otherwise, each of the following terms has the meaning set forth below:

1. “Opposer” means THE WONDERFUL COMPANY LLC and any and all predecessors, affiliates, parents, subsidiaries and divisions thereof, and all officers, directors, employees, agents, representatives, attorneys or other Persons acting, or who at any time acted or

purported to act, on behalf of THE WONDERFUL COMPANY LLC or on behalf of any such predecessors, affiliates, parents, subsidiaries and divisions thereof.

2. “Applicant” means KEVIN BARNETT and any and all predecessors, affiliates, parents, subsidiaries and divisions thereof, and all officers, directors, employees, agents, representatives, attorneys or other persons acting, or who at any time acted or purported to act, on behalf of KEVIN BARNETT, or on behalf of any such predecessors, affiliates, parents, subsidiaries and divisions thereof.

3. The “WONDERLAND FARMS Mark” shall mean the trademark Applicant applied for, Application Serial No. 88287058, which is the subject of Opposer’s Opposition.

4. The “WONDERFUL Marks” refers Opposer’s registered trademarks which it claims the WONDERLAND FARMS Mark is confusingly similar to, as stated and referenced in its Notice of Opposition.

5. The term “goods” shall mean the goods Applicant intends to sell under the WONDERLAND FARMS Mark.

6. The “Application” means the application for the WONDERLAND FARMS Mark with the United States Patent and Trademark Office (“USPTO”).

7. The term “you” refers to Kevin Barnett, the Applicant for the WONDERLAND FARMS Mark.

8. “Person” means any natural person, firm, association, organization, partnership, joint venture, corporation, limited partnership, business, trust, limited liability corporation, limited liability partnership, government agency or other form of entity or governmental body.

9. The terms “Referring To”, “Relating To” or “Evidencing” shall mean reflecting, concerning, pertaining to, mentioning, discussing, summarizing, describing, regarding,

containing, referring to, depicting, connected with, embodying, evidencing, constituting, reporting, or in any way connected to the matter discussed.

10. The term “Document” refers to any written or recorded matter as described in Rule 34 of the Federal Rules of Civil Procedure including but not limited to any and all writings, correspondence, books, memoranda, invoices, contracts, purchase orders, receipts, publications, studies, catalogs, periodicals, labels, packaging, displays, pamphlets, slides, videotapes, films, artwork, drawings, charts, sketches, photographs, illustrative materials, circulars, price lists, advertisements, layouts, tear sheets, magnetic recording tapes, microfilm and other storage means by which information is retained in retrievable form, and all other materials whether printed, typewritten, handwritten, recorded, or reproduced by any process written or recorded matter, and shall include the original and every non identical copy, draft or reproduction in the possession, custody or control of Applicant. The definition also includes information stored or recorded by any electronic means, including, without limitation, in a computer, hard drive, compact disc, floppy disk, diskette, tape, record, cassette, electronic mail or voice mail, any other electronic recording or other data compilation from which information can be obtained or translated, or any matters defined in Rule 1001 of the Federal Rules of Evidence. Any such document bearing on any sheet (front or back), margin, attachment or enclosure thereof, any marks, such as, without limitation, initials, stamped initials, comments, or notations of any character, which are not part of the original text or reproduction thereof, is to be considered and produced as a separate document.

11. The terms “all” and “each” shall both be construed as all and each.

12. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

13. The use of the singular form of any word includes the plural and vice-versa.

14. The term “prosecution” shall mean proceedings before the USPTO, including any interviews, correspondence or other materials, whether or not included in the prosecution file history maintained at the USPTO.

15. “Thing” or “Things” means any tangible item, including without limitation models, prototypes and samples of any device, product or apparatus.

16. The terms “Identify” or “Identity” shall have the following meanings, as the context shall make appropriate:

a. When used with respect to a person, Applicant shall state the name of the Person, describe the present or last known business address of that person or the present or last known residence address. If Applicant lacks such knowledge, state that Person’s present or last known business, occupation, and employer, if any. Once a Person has been thus identified in answer to an Interrogatory, it shall be sufficient, when again identifying that Person, to state only his, her or its name.

b. When used with respect to a Document, Applicant shall state the date of the Document, describe the general nature (e.g., letter, memorandum, photograph, computer printout, etc.) and subject matter of the Document and specify:

i. The author or originator of the Document;

ii. Each Person indicated as an addressee or copy recipient, or known by Applicant to have received a copy of the Document; and

iii. If privilege is claimed by Applicant with respect thereto, state sufficient particulars to evaluate and contest the claim of privilege, including the date, author, addressee, recipients of copies and a statement of the subject matter contained in the Document.

c. When used with respect to a communication, Applicant shall, even though it may claim privilege with respect thereto, state whether the communication was written or oral. If written, Applicant shall identify the Document or Documents in which the communication was made. If oral, Applicant shall state:

i. The manner in which the communication was made (e.g., in person, by telephone, by radio, etc.);

ii. The identity of each Person who participated in or witnessed the communication;

iii. The present location of each Person who participated in or witnessed the communication; and

iv. The date and place of the communication.

17. If Applicant objects that a term or phrase is ambiguous or indefinite, then provide your understanding of the term or phrase and respond accordingly, as if that term or phrase has been so defined.

18. “State” or “Describe” mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise, or bear upon the matter concerning which information is requested.

19. The term “Likelihood of Confusion Analysis” means an analysis of the factors articulated by the Court of Customs and Patent Appeals for determining whether there is a likelihood of confusion between marks used by different parties, namely, the following du Pont

factors: (1) the similarity or dissimilarity of the marks in their entireties as to appearance, sound, connotation and commercial impression; (2) the similarity or dissimilarity and nature of the goods or services as described in an application or registration or in connection with which a prior mark is in use; (3) the similarity or dissimilarity of established, likely-to-continue trade channels; (4) the conditions under which and buyers to whom sales are made, i.e. “impulse” vs. careful, sophisticated purchasing; (5) the fame of the prior mark (sales, advertising, length of use); (6) the number and nature of similar marks in use on similar goods; (7) the nature and extent of any actual confusion; (8) the length of time during and conditions under which there has been concurrent use without evidence of actual confusion; (9) the variety of goods on which a mark is or is not used (house mark, “family” mark, product mark); (10) the market interface between applicant and the owner of a prior mark: (a) a mere “consent” to register or use; (b) agreement provisions designed to preclude confusion, i.e. limitations on continued use of the marks by each party; (c) assignment of mark, application, registration and good will of the related business; (d) laches and estoppel attributable to owner of prior mark and indicative of lack of confusion; (11) the extent to which applicant has a right to exclude others from use of its mark on its goods; (12) the extent of potential confusion, i.e., whether *de minimis* or substantial; (13) any other established fact probative of the effect of use. See In re E. I. du Pont de Nemours & Co., 476 F.2d 1357, 1361 (1973).

INTERROGATORIES

1. How do you earn your living?
2. How did you come up with the name for the WONDERLAND FARM Mark?
3. When did you become aware of the existence of the WONDERFUL Marks?
4. Describe what steps you took, if any, to determine whether your

WONDERLAND FARMS mark would be confusingly similar to any other trademark.

5. Have you used the WONDERLAND FARMS Mark yet to sell goods in commerce?
6. If your answer to the above interrogatory is no, do you have a date planned for when you will start selling goods bearing the WONDERLAND FARMS Mark?
7. Have you formed a company or other legal entity for the purpose of selling goods in commerce under the WONDERLAND FARMS Mark?
8. Other than applying for the WONDERLAND FARMS Mark, identify all steps you have taken, if any, to using the WONDERLAND FARMS Mark in commerce
9. Do you have a business plan for the selling of goods under the WONDERLAND FARMS Mark?
10. Have you created a specimen of the logo you plan to use with the goods bearing the WONDERLAND FARMS mark?
11. Have you created sample labels, tags, wrapping , packaging or package inserts bearing the WONDERLAND FARMS Mark?
12. How do you plan to advertise, if at all, the goods that will bear the WONDERLAND Farms Mark?
13. Do you have an agreement with any entity for designing the logo for the WONDERLAND FARMS Mark?
14. Do you have an agreement with any retail entity to carry the goods that will bear the WONDERLAND FARMS Mark?
15. Have you communicated with any retail entity for the purpose of securing an agreement to have them carry the goods that will bear the WONDERLAND FARMS Mark?

16. If your answer to the Interrogatory above is yes, identify the entity/entities you spoke to and the date(s) of such discussion(s).
17. Have you set the retail price for the goods you intend to sell under the WONDERLAND FARMS Mark?
18. If your response to the Interrogatory. 17 is yes, state the price(s).
19. Identify the name of the entities from which you plan to source the goods you intend to sell under the WONDERLAND FARMS Mark?
20. Have you communicated with any entity for the purpose of securing an agreement for them to source the goods that will bear the WONDERLAND FARMS Mark?
21. Which retailers will carry the WONDERLAND FARMS Mark?
22. Identify all goods you intend to sell, using the WONDERLAND FARMS Mark.
23. Identify, all experience you have, if any, in the growing, processing, packaging, distribution or marketing of goods you identified in the Interrogatory No. 22.
24. Have you ever sold fresh fruit or vegetables or fresh fungi under a branded mark before?
25. Do you have a marketing or advertising budget for goods bearing the WONDERLAND FARMS Mark?
26. Describe all trade channels in which the goods bearing the WONDERLAND FARMS Mark are or will be sold.
27. In what states will goods bearing the WONDERLAND FARMS Mark be sold?
28. In what cities will goods bearing the WONDERLAND FARMS Mark be sold?
29. Describe the types of consumers you intend to target for purchase of your goods.

CERTIFICATE OF SERVICE

I, Susan Bryant, hereby certify that a copy of this OPPOSER’S THE WONDERFUL
COMPANY LLC’S FIRST SET OF INTERROGATORIES TO APPLICANT KEVIN

BARNETT has been served upon attorney for Applicant:

KEVIN BARNETT
31922 FOXMOOR CT
WESTLAKE VILLAGE, CA 91361
Email: kwb12345c@gmail.com
Phone: 818-540-8087

by email on this 21st day of September, 2020.

/ Susan Bryant /

Susan Bryant
ROLL LAW GROUP PC
11444 West Olympic Boulevard
Los Angeles, California 90064-1557
Telephone: (310) 966-8400
Facsimile: (310) 966-8810

EXHIBIT B

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

THE WONDERFUL COMPANY LLC,

Opposer,

v.

KEVIN BARNETT,

Applicant.

Opposition No. 91263587

**OPPOSER THE WONDERFUL COMPANY LLC'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO APPLICANT KEVIN BARNETT**

PROPOUNDING PARTY: OPPOSER THE WONDERFUL COMPANY LLC

RESPONDING PARTY: APPLICANT KEVIN BARNETT

SET NO.: ONE

In accordance with Rule 34 of the Federal Rules of Civil Procedure, and Rules 2.116 and 2.120 of the Trademark Rules of Practice, THE WONDERFUL COMPANY LLC (“Opposer”), requests that KEVIN BARNETT (“Applicant”) produce for inspection and copying the documents in the possession, custody or control of Applicant that are called for in the numbered requests set forth hereinafter. The documents are to be produced within thirty (30) days of the date of service hereof at the offices of Roll Law Group P.C. 11444 West Olympic Blvd., Los Angeles, California 90064.

DEFINITIONS AND INSTRUCTIONS

As used herein, unless the context in which it appears clearly suggests otherwise, each of the following terms has the meaning set forth below:

1. “Opposer” means THE WONDERFUL COMPANY LLC and any and all predecessors, affiliates, parents, subsidiaries and divisions thereof, and all officers, directors, employees, agents, representatives, attorneys or other Persons acting, or who at any time acted or purported to act, on behalf of THE WONDERFUL COMPANY LLC or on behalf of any such predecessors, affiliates, parents, subsidiaries and divisions thereof.

2. “Applicant” means KEVIN BARNETT and any and all predecessors, affiliates, parents, subsidiaries and divisions thereof, and all officers, directors, employees, agents, representatives, attorneys or other persons acting, or who at any time acted or purported to act, on behalf of KEVIN BARNETT, or on behalf of any such predecessors, affiliates, parents, subsidiaries and divisions thereof.

3. The “WONDERLAND FARM Mark” shall mean the trademark Applicant applied for, Application Serial No. 88287058 which is the subject of Opposer’s Opposition.

4. The “WONDERFUL Marks” refers to Opposer’s registered trademarks which it claims the WONDERLAND FARM Mark is confusingly similar to, as stated and referenced in its Notice of Opposition.

5. The term “Applicant’s Goods” shall mean Applicant’s product alleged by Opposer to cause a likelihood of confusion, that is, product bearing the WONDERLAND FARM Mark.

6. The term “you” refers to Applicant Kevin Barnett.

7. “Person” means any natural person, firm, association, organization, partnership, joint venture, corporation, limited partnership, business, trust, limited liability corporation, limited liability partnership, government agency or other form of entity or governmental body.

8. The terms “Referring To”, “Relating To” or “Evidencing” shall mean reflecting, concerning, pertaining to, mentioning, discussing, summarizing, describing, regarding, containing, referring to, depicting, connected with, embodying, evidencing, constituting, reporting, or in any way connected to the matter discussed.

9. The term “Document” refers to any written or recorded matter as described in Rule 34 of the Federal Rules of Civil Procedure including but not limited to any and all writings, correspondence, books, memoranda, invoices, contracts, purchase orders, receipts, publications, studies, catalogs, periodicals, labels, packaging, displays, pamphlets, slides, videotapes, films, artwork, drawings, charts, sketches, photographs, illustrative materials, circulars, price lists, advertisements, layouts, tear sheets, magnetic recording tapes, microfilm and other storage means by which information is retained in retrievable form, and all other materials whether printed, typewritten, handwritten, recorded, or reproduced by any process written or recorded matter, and shall include the original and every non identical copy, draft or reproduction in the possession, custody or control of Applicant. The definition also includes information stored or recorded by any electronic means, including, without limitation, in a computer, hard drive, compact disc, floppy disk, diskette, tape, record, cassette, electronic mail or voice mail, any other electronic recording or other data compilation from which information can be obtained or translated, or any matters defined in Rule 1001 of the Federal Rules of Evidence. Any such document bearing on any sheet (front or back), margin, attachment or enclosure thereof, any marks, such as, without limitation, initials, stamped initials, comments, or notations of any

character, which are not part of the original text or reproduction thereof, is to be considered and produced as a separate document.

10. The terms “all” and “each” shall both be construed as all and each.

11. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

12. The use of the singular form of any word includes the plural and vice-versa.

13. “Thing” or “Things” means any tangible item, including without limitation, models, prototypes and samples of any device, product or apparatus.

14. The term “Likelihood of Confusion” refers to the standard articulated by the Court of Customs and Patent Appeals for determining whether there is a likelihood of confusion between marks used by different parties, namely, the following du Pont factors: (1) the similarity or dissimilarity of the marks in their entireties as to appearance, sound, connotation and commercial impression; (2) the similarity or dissimilarity and nature of the goods or services as described in an application or registration or in connection with which a prior mark is in use; (3) the similarity or dissimilarity of established, likely-to-continue trade channels; (4) the conditions under which and buyers to whom sales are made, i.e. “impulse” vs. careful, sophisticated purchasing; (5) the fame of the prior mark (sales, advertising, length of use); (6) the number and nature of similar marks in use on similar goods; (7) the nature and extent of any actual confusion; (8) the length of time during and conditions under which there has been concurrent use without evidence of actual confusion; (9) the variety of goods on which a mark is or is not used (house mark, “family” mark, product mark); (10) the market interface between applicant and the owner of a prior mark: (a) a mere “consent” to register or use; (b) agreement

provisions designed to preclude confusion, i.e. limitations on continued use of the marks by each party; (c) assignment of mark, application, registration and good will of the related business; (d) laches and estoppel attributable to owner of prior mark and indicative of lack of confusion; (11) the extent to which applicant has a right to exclude others from use of its mark on its goods; (12) the extent of potential confusion, i.e., whether *de minimis* or substantial; (13) any other established fact probative of the effect of use. See In re E. I. du Pont de Nemours & Co., 476 F.2d 1357, 1361 (1973).

15. The term “Communication” means any contact between two or more Persons and shall include, without limitation, inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, emails, correspondence, notes or any other form of written contacts by such means as any document or oral contact by such means as face-to-face or in-person meetings, negotiations, telephone conversations, e-mail, or any other form of electronic contact.

16. The terms “Identify” or “Identity” shall have the following meanings, as the context shall make appropriate:

(a) When used with respect to a person, Applicant shall state the name of the Person, describe the present or last known business address of that person or the present or last known residence address. If Applicant lacks such knowledge, state that Person’s present or last known business, occupation, and employer, if any. Once a Person has been thus identified in answer to an Interrogatory, it shall be sufficient, when again identifying that Person, to state only his, her or its name.

(b) When used with respect to a Document, Applicant shall state the date of the Document, describe the general nature (e.g., letter, memorandum, photograph, computer printout, etc.) and subject matter of the Document and specify:

(1) The author or originator of the Document;

(2) Each Person indicated as an addressee or copy recipient, or known by Applicant to have received a copy of the Document; and

(3) If privilege is claimed by Applicant with respect thereto, state sufficient particulars to evaluate and contest the claim of privilege, including the date, author, addressee, recipients of copies and a statement of the subject matter contained in the Document.

(c) When used with respect to a communication, Applicant shall, even though it may claim privilege with respect thereto, state whether the communication was written or oral. If written, Applicant shall identify the Document or Documents in which the communication was made. If oral, Applicant shall state:

(1) The manner in which the communication was made (e.g., in person, by telephone, by radio, etc.);

(2) The identity of each Person who participated in or witnessed the communication;

(3) The present location of each Person who participated in or witnessed the communication; and

(4) The date and place of the communication.

17. If any otherwise responsive Document or Thing has been, but no longer is, in the possession, custody or control of Applicant, each such Document is to be identified by setting

forth the following information to the extent known: (i) each addressor and addressee; (ii) the addresses of any indicated copies or blind copies; (iii) the date, subject matter, and number of pages of such Document; (iv) the identity of any attachment or appendices to such Document; (v) all Persons to whom such Document was distributed, shown or explained; (vi) its date of destruction or discard, manner of destruction or discard, and reasons for destruction or discard; and (vii) the Persons authorizing and carrying out such destruction or discard.

18. A schedule of Documents withheld from production by reason of any privilege, claim that it constitutes work product, or other immunity from discovery shall accompany the production. For each Document withheld, the schedule shall identify the following with respect to each:

- (a) A description of the general type of Documents, e.g., letter, memorandum, report, miscellaneous note, etc.;
- (b) The number of pages comprising the Document;
- (c) The date(s) on which the Document was prepared and distributed;
- (d) The identity of the author;
- (e) The organization, if any, with which the author was then connected and his title or job description;
- (f) The identity of all addressees;
- (g) The identity of all other distributees;
- (h) The organization, if any, with which each addressee and distributee was then connected;
- (i) A general summary of the subject matter of the Document;
- (j) The grounds for refusing to produce the Document;

(k) Whether any portion of the Document is not privileged;

(l) If the Document reflects or refers to a meeting(s) or conversation(s), the name and address of all Persons who were present at or parties to the meeting(s) or conversation(s), and a description of who those Persons are; and

(m) Each withheld Document shall be given an index number for the simplification of identification. The schedule shall be sufficiently detailed to permit Applicant to determine whether to make a motion with respect thereto, and/or to serve a subpoena duces tecum with respect thereto.

19. The obligation to provide the information sought by these document requests is continuing within the terms of Rule 26(e) of the Federal Rules of Civil Procedure.

20. Applicant is requested to produce Documents as they are kept in the usual course of business or to organize and label them to correspond with the categories in the request as provided in Rule 34(b) of the Federal Rules of Civil Procedure.

21. In producing the requested Documents, Applicant is required to furnish all documents available to it including, by way of illustration only, and not limited to, Documents in the possession, custody or control, of Applicant, its attorneys or its consultants or investigators or in the possession of Applicant's consultants, advisors, agents or associates.

22. As to any portion of any request which refers to Documents that Applicant is aware of which were at one time within the possession, custody or control of Applicant but which are not now within or subject to the possession, custody or control of Applicant, identify such Documents in a manner sufficient to describe such for a subpoena duces tecum and give the name, telephone number and address of the Person last known by Applicant to have been in possession, custody or control of such Documents.

23. If Applicant objects that a term or phrase is ambiguous or indefinite, then provide your understanding of the term or phrase and respond accordingly, as if that term or phrase has been so defined.

24. If Applicant is aware that a Document or group of Documents responsive to these requests once existed, but has been destroyed or discarded, Applicant is directed to state when the Document or group of Documents was destroyed or discarded, why the Document or group of Documents was destroyed or discarded, the Person most knowledgeable about the content of the Document(s) and the circumstances under which the document or group of Documents was destroyed or discarded.

25. Color copies of Documents are to be produced where color is necessary to interpret or understand the contents.

26. If, after exercising reasonable diligence, Applicant is unable to determine the existence of any Documents or things falling within a production request, Applicant is requested to so state in any written response.

27. These requests for Documents and things are submitted for purposes of discovery only, and nothing contained herein shall be taken as an admission of relevance, or as a manner of any objections to the admissibility at trial, or of any evidence or information requested or furnished in response thereto.

DOCUMENT REQUESTS

1. Documents sufficient to show all the various ways the WONDERLAND FARM Mark is used in commerce and is seen by the consuming public.

2. Documents sufficient to show all trade channels whereby Applicant offers Applicant's goods to the public.

3. Documents sufficient to show pricing of Applicant's Goods.
4. Documents sufficient to show where Applicant sources products bearing the WONDERLAND FARM Mark from.
5. Each and every Document Referring To the facts and circumstances surrounding when Applicant first came to know of the existence of Opposer and its WONDERFUL Marks.
6. Documents sufficient to show all manners in which Applicant uses any variation of the WONDERLAND FARM Mark in any color combination.
7. Each and every Document Referring To any determination or consideration by Applicant of whether or not Applicant's Goods are likely to cause confusion with Opposer's WONDERFUL Marks.
8. A sample of Each different label, tag, wrapping, package, package insert, advertisement, marketing or promotional material, and website page used or planned to be used in connection with Applicant's Goods or the WONDERLAND FARM Mark.
9. Documents sufficient to show the identity of any periodicals or other publications containing any articles, advertising or promotional material Evidencing Applicant's Goods.
10. Each and every Document upon which Applicant relies or has relied on in formulating the opinion that the WONDERLAND FARM Mark does not cause a Likelihood of Confusion with Opposer's WONDERFUL Marks, including, but not limited to, opinions of counsel, third-party uses, trademark applications or registrations, advertising brochures, manuals, photographs, physical specimen, drawings, or other materials Relating To Applicant's or third parties' products or trademark rights.
11. Each and every Document Relating To Communications between Applicant and Opposer.

12. Each Communication from customers or other third parties to this action that support or refute the claims in the Opposition.
13. Each Communication between Applicant and any third party to this action regarding the WONDERLAND FARM Mark.
14. Documents sufficient to show Applicant's consideration, conception, creation, design, development, selection, adoption and first use of the WONDERLAND FARM Mark, including, but not limited to, searches, investigations, reports, and opinions.
15. Each and every Document sufficient to Identify Each Person involved in the consideration, conception, creation, design, development, selection, adoption and first use or planned first use of the WONDERLAND FARM Mark.
16. All written directives, manuals of instruction, or other Documents which set forth Applicant's procedures for adopting trademarks or service marks.
17. All Documents evidencing Your date of planned first use of the WONDERLAND FARM Mark in commerce.
18. All Documents that support Your intent to use the WONDERLAND FARM Mark in commerce.
19. All Documents Relating To any assignment, license, or other transfer or grant of any rights to or from Applicant or any third party in the WONDERLAND FARM Mark.
20. All Documents showing orders for Applicant's Goods.
21. All Documents Relating To inquiries, including but not limited to purchase or distribution inquiries, about Applicant's Goods.

22. All agreements or any other Documents between Applicant and any third party Relating To the WONDERLAND FARM Mark including but not limited to the marketing and sale of products under or in connection with the WONDERLAND FARM Mark.

23. All Documents that support or refute Applicant's denial of any allegation in the Notice of Opposition.

24. All documents that show the advertising or marketing budget for the sale of products under or in connection with the WONDERLAND FARM Mark.

25. All Documents Relating To any instances or possible instances of confusion, mistake, deception or association of any kind among members of the public or trade which have or may have occurred between Applicant's WONDERLAND FARM Mark on the one hand, and Opposer's WONDERFUL Marks on the other hand.

26. All Documents Relating to where the products under or in connection with the WONDERLAND FARM Mark will be sold.

27. All Documents Relating to the trade channels you anticipate the products under or in connection with the WONDERLAND FARM Mark will be sold.

28. All Documents Relating To any studies, investigation, surveys, opinions or reports, including but not limited to studies, opinions or reports of advertising and marketing agencies, and polling, public relations, market research and public opinion agencies, consulted or retained by Applicant, which refer to any advertising or promotional materials for Applicant's Goods.

29. All Documents Evidencing Applicant's date of first use or planned first use of the FIJI RAW SUGAR Mark on or in connection with each of Applicant's Goods anywhere and in interstate and/or intrastate commerce.

30. All Documents Evidencing the contentions made in the Answer to the Notice of Opposition.

31. All communication with any third party relating to Your WONDERLAND FARM Mark.

32. All Documents necessary to Identify the outlets or stores through which Applicant's Goods have been, will be, or are being, sold.

33. A copy of All agreements between You and any distributor or sub-distributor for Applicant's Goods.

34. All communication with any third party relating to the goods to be sold in connection with the WONDERLAND FARM Mark.

35. All Documents evidencing all steps taken by You or anyone else to use the WONDERLAND FARM Mark in commerce.

36. All business plans relating to the sale of goods to be sold in connection with the WONDERLAND FARM Mark.

37. All agreements related to the goods to be sold in connection with the WONDERLAND FARM Mark.

38. All Documents Relating to the price of the goods to be sold in connection with the WONDERLAND FARM Mark.

CERTIFICATE OF SERVICE

I, Susan Bryant, hereby certify that a copy of this OPPOSER THE WONDERFUL COMPANY LLC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO APPLICANT KEVIN BARNETT has been served upon attorney for Applicant:

KEVIN BARNETT
31922 FOXMOOR CT
WESTLAKE VILLAGE, CA 91361
Email: kwb12345c@gmail.com
Phone: 818-540-8087

by email on this 30th day of September , 2020.

/ Susan Bryant /

Susan Bryant
ROLL LAW GROUP PC
11444 West Olympic Boulevard
Los Angeles, California 90064-1557
Telephone: (310) 966-8400
Facsimile: (310) 966-8810

EXHIBIT C

In The United States Patent And Trademark Office
Before The Trial And Appeal Board

Application No. 88287058 Opposition No. 91263587

Mark: Wonderland Farms Filed Feb-2-2019

Interrogatories - Answers

1. Gardening
2. I am making a wonderland clothing company.
3. I am not sure.
4. I believe I looked up wonderland and wonderland farms in the international class 31 and found no conflicting prior registrations.
5. No
6. I do not have a planned date
7. No
8. I have not taken any steps to use the mark in commerce.
9. No.
10. No.
11. No.

12. I do not have any plans to advertise at this time.

13. No.

14. No.

15. No.

16. -

17. No.

18. -

19. I have no plans of sourcing goods at this time.

20. No.

21. I am not sure which retailers will carry the wonderland farms mark.

22. The goods that may be sold using the mark as stated in application are "Fruit, fresh; Vegetables, fresh; Fresh edible fungi; Live plants; Live trees; Raw nuts; Unprocessed cereals; Unprocessed herbs"

23. I have no experience other than backyard growing of such plants, fruits and vegetables.

24. No.

25. I have no set budget for marketing or advertising.

26. They are not currently sold anywhere and I do not know where they will be sold.

27. Most likely goods will be sold in California, other than that I am not sure now.

28. I do not know what cities the goods will be sold in.

29. I have no intention of targeting specific consumers at this time.

30. I do not expect consumers to have any specialized knowledge when making purchasing decisions about my goods.

31. I do not expect consumers to have any specialized degree of care when making purchasing decisions about my goods.

32. I am not sure if the customers will be impulse purchasers or not. Maybe they will like that kind of fruit or vegetable and therefore buy it.

33. No.

34. No.

35. All documents are authentic.

CERTIFICATE OF SERVICE

I, Kevin Barnett, hereby certify that a copy of these INITIAL DISCLOSURES has been served to opposer:

Michael Vasseghi
ROLL LAW GROUP PC
11444 West Olympic Boulevard
Susan.Bryant@roll.com

by email on this 16th day of November, 2020.

/Kevin Barnett/
31922 Foxmoor Ct
Westlake Village CA
91361

818-540-8087

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct

11/16/2020 /Kevin Barnett/

Defendant

EXHIBIT D

In The United States Patent And Trademark Office
Before The Trial And Appeal Board

Application No. 88287058 Opposition No. 91263587

Mark: Wonderland Farms Filed Feb-2-2019

Request for documents answers.

1. I have no such documents.
2. I have no such documents.
3. I have no such documents.
4. I have no such documents.
5. I have no such documents.
6. I have no such documents.
7. I have no such documents.
8. I have no such documents.
9. I have no such documents.
10. I have no such documents.
11. I have no such documents.
12. I have no such documents.
13. I have no such documents.
14. I have no such documents.
15. I have no such documents.
16. I have no such documents.
17. I have no such documents.
18. I have no such documents.
19. I have no such documents.

20.I have no such documents.

21.I have no such documents.

22.I have no such documents.

23.I have no such documents.

24.I have no such documents.

25.I have no such documents.

26.I have no such documents.

27.I have no such documents.

28.I have no such documents.

29.I have no such documents.

30.I have no such documents.

31.I have no such documents.

32.I have no such documents.

33.I have no such documents.

34.I have no such documents.

35.I have no such documents.

36.I have no such documents.

37.I have no such documents.

38.I have no such documents.

39.I have no such documents.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

11/16/2020 /Kevin Barnett/

Defendant

EXHIBIT E

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

THE WONDERFUL COMPANY LLC)	Opposition No.: 91263587
)	
Opposer,)	Mark: WONDERLAND FARMS
)	
v.)	Application Ser. No.: 88287058
)	
KEVIN BARNETT)	Published in the <i>Official Gazette</i>
)	on March 17, 2020
)	
Applicant.)	AMENDED NOTICE OF OPPOSITION
)	

The Wonderful Company LLC, a Delaware limited liability company located and doing business at 11444 West Olympic Blvd., Los Angeles, CA 90064 (“TWC” or “Opposer”), believes it will be damaged by the registration of the WONDERLAND FARMS mark (the “Applicant’s WONDERLAND FARMS Mark”), as set forth in Application Serial No. 88287058 filed on February 2, 2019 (the “Application”) in Class 31 for “*fruit, fresh; vegetables, fresh; fresh edible fungi*” (“Applicant’s Goods”), filed by Kevin Barnett, a United States citizen, (“Applicant”), with an address of 31922 Foxmoor Ct, Westlake Village, California 91361, and hereby opposes the same.

As grounds for this Opposition, TWC alleges:

1. TWC is a privately-held global company dedicated to growing, harvesting, packaging and marketing high-quality, healthy and iconic brands of fresh fruit, nuts, and juice.

2. One TWC company, Wonderful Citrus LLC, is the largest grower and processor of citrus fruits in the United States, cultivating and harvesting more than 40,000 acres of fresh citrus, including but not limited to, clementine/mandarins, Navel and Valencia oranges, lemons, minneolas, grapefruit and others.

3. TWC is the owner of common law trademark rights to the WONDER FRUIT trademark in the United States for use in connection with “fresh fruits and vegetables” (“Opposer’s Goods”) and is the owner of numerous United States trademark registrations and applications comprising of, or containing, WONDER or WONDERFUL (collectively, the “WONDER Marks”) for fresh fruits and vegetables.

4. For instance, TWC’s trademark registrations for fresh fruits and vegetables goods include:

TRADEMARK	APPLICATION/ REGISTRATION	CLASS and GOODS
WONDER FRUIT	Registration No. 2839828	Class 31 for fresh fruits and vegetables
WONDER FRUIT	Common Law	Fresh fruits and vegetables
WONDERFUL	Registration No. 4552106	Class 31 for Fresh citrus fruits
WONDERFUL & Design	Registration No. 4552134	Class 31 for Fresh citrus fruits
WONDERFUL SWEET SCARLETTS	Registration No. 4788641	Class 31 for Fresh citrus fruits, namely grapefruit, excluding grapes, peaches and watermelons
WONDERFUL SWEET SCARLETTS & Design	Registration No. 4788640	Class 31 for Fresh citrus fruits, namely grapefruit, excluding grapes, peaches and watermelons
WONDERFUL SCARLETTS	Registration No. 5137894	Class 31 for Fresh citrus fruits, namely grapefruit

WONDERFUL CITRUS	Registration No. 5719783	Class 31 for Citrus fruit, fresh; fresh citrus fruits
POM WONDERFUL	Registration No. 2640835	Class 31 for Fresh fruits
POM WONDERFUL & Design	Registration No. 2780314	Class 31 for Fresh fruits Class 32 for Fruit juices and fruit juice concentrates

5. The WONDER Marks have been used in commerce since long prior to Applicant's February 2, 2019 filing date of the Application filed on an intent-to-use basis, and valuable goodwill has been built up and is associated with, and symbolized by, the WONDER Marks.

6. Any use by Applicant of its WONDERLAND FARMS Mark on Applicant's Goods in Class 31 is without TWC's consent or permission.

7. Any use or registration of the WONDERLAND FARMS Mark by Applicant for Applicant's Goods will be damaging to Opposer.

8. Opposer timely filed on April 13, 2020 and May 13, 2020 Requests for Extension of Time to Oppose in the Application, both of which were granted by the Trademark Trial and Appeal Board. An Opposition to the Application must be filed by July 15, 2020. Therefore, this Notice of Opposition is being timely filed.

COUNT I – LIKELIHOOD OF CONFUSION

9. TWC incorporates paragraphs 1 through 8 above herein by reference.

10. Applicant's WONDERLAND FARMS Mark so closely resembles the WONDER Mark as to be likely, when used on or in connection with Applicant's Goods, to cause confusion, to

cause mistake, or to deceive in violation of Section 2(d) of the Lanham Act, 15 U.S.C. §1052(d), as amended. The WONDERLAND FARMS Mark also conveys the same commercial impression as the WONDER Marks.

11. Applicant's Goods are similar and/or related to the goods used in connection with the WONDER Marks. Applicant's proposed use and registration of the WONDERLAND FARMS Mark in connection with Applicant's Goods is likely to cause confusion, deception and/or mistake among the relevant public.

12. The purchasing public is likely to be led to believe that goods bearing the WONDERLAND FARMS Mark emanate from or are approved, licensed, sponsored by, or in some other way legitimately connected with or affiliated with Opposer or that Applicant and its business are owned by or are affiliated with Opposer and its business.

13. If Applicant is permitted to use the Applicant's WONDERLAND FARMS Mark as specified in the Application, confusion in trade resulting in damage and injury to Opposer would be caused and would result by reason of the similarity between the WONDERLAND FARMS Mark and the WONDER Marks. Consumers familiar with the WONDER Marks would be likely to believe Applicant's goods are provided by Opposer or provided with Opposer's authorization or approval. Furthermore, any defect, objection or fault found with Applicant's goods sold under the WONDERLAND FARMS Mark would necessarily injure Opposer's reputation and the goodwill Opposer has established in the WONDER Marks.

COUNT II – LACK OF BONA FIDE INTENT TO USE MARK

As a separate and additional ground of opposition, Applicant's registration should be denied because, upon information and belief, Applicant did not have a bona fide intent to use the WONDERLAND FARMS Mark in commerce for goods specified in the Application when he filed

the Application as shown by her testimony in this proceeding and the fact that she has no documents or information that evidences such intent at or around the time of filing the Application or thereafter.

WHEREFORE, Opposer respectfully requests that this Opposition be sustained and that Application Serial No. 88287058 be denied registration.

Please address all correspondence to Danielle M. Criona, Esq., Special Counsel, Intellectual Property, at Roll Law Group P.C., 11444 West Olympic Boulevard, 7th Floor, Los Angeles, CA 90064.

Respectfully submitted,

Date: November 19, 2020

The Wonderful Company LLC

By: /s/ Michael M. Vasseghi
Michael M. Vasseghi, Esq.
Danielle M. Criona, Esq.
ROLL LAW GROUP P.C.
11444 West Olympic Blvd., 7th Floor
Los Angeles, CA 90064
Tel. (310) 966-8771
Fax (310) 966-8810
danielle.criona@roll.com
ipdocketing@roll.com
Attorneys for Opposer

CERTIFICATE OF SERVICE

I, Susan Bryant, hereby certify that a copy of this DECLARATION OF MICHAEL M. VASSEGHI IN SUPPORT OF MOTION FOR LEAVE TO AMEND NOTICE OF OPPOSITION has been served upon attorney for Applicant:

KEVIN BARNETT
31922 FOXMOOR CT
WESTLAKE VILLAGE, CA 91361
Email: kwb12345c@gmail.com; akbar2240@gmail.com
Phone: 818-540-8087

by email on this 19th day of Novemer, 2020.

/s/ Susan Bryant

Susan Bryant
ROLL LAW GROUP PC
11444 West Olympic Boulevard
Los Angeles, California 90064-1557
Telephone: (310) 966-8400
Facsimile: (310) 966-8810