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

Proceeding	91266792
Party	Defendant Lunarandowner.Com, Inc
Correspondence Address	LORNE E. BERKELEY DANIELS, RODRIGUEZ, BERKELEY, DANIELS & CRUZ, PA 4000 PONCE DE LEON BLVD. 4000 PONCE DE LEON BLVD. CORAL GABLES, FL 33146 UNITED STATES Primary Email: lberkeley@drbdc-law.com 305-448-7988
Submission	Other Motions/Submissions
Filer's Name	Lorne Berkeley
Filer's email	Lberkeley@drbdc-law.com
Signature	/Lorne Berkeley/
Date	04/08/2021
Attachments	LL initial.pdf(143988 bytes)

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

In the Matter of Application Serial No. 88671419

For the mark: LUNARLAND.COM

Published: September 1, 2020

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Dennis M. Hope,	:	
	:	Opposition No.: 91266792
Opposer,	:	
	:	
v.	:	
	:	
LUNARLANDOWNER.COM, INC.,	:	
	:	
Applicant.	:	

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APPLICANT’S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Section 401 of the Trademark Trial and Appeal Board Manual of Procedure, and 37 C.F.R. § 2.120, Applicant Lunarlandowner.com, Inc. (“Applicant”), by and through its attorneys, Daniels, Rodriguez, Berkeley, Daniels & Cruz, PA, hereby submits its initial disclosures to Opposer Dennis M. Hope (“Registrant”).

A. Individuals Likely to Have Discoverable Information

Applicant hereby identifies those individuals likely to have discoverable information that Applicant may use to support its claims and/or defenses. Applicant reserves the right to supplement or amend this list of individuals as appropriate.

<u>PERSON</u>	<u>SUBJECT OF INFORMATION</u>
<p>James Demestre President at Lunarlandowner.com, Inc.</p> <p>Contact may be made through counsel listed below.</p>	<p>Knowledge of Applicant's mark including adoption, use, and ownership of, and rights in and to, such mark; promotion, marketing, and advertising under such mark; sales in connection with such mark; knowledge of all aspects of Applicant's business operations and activities and of the market in which Applicant operates.</p>
<p>Sandra Demestre Logistics at Lunarlandowner.com, Inc.</p> <p>Contact may be made through counsel listed below.</p>	<p>Knowledge of Applicant's mark including use of the mark, promotion, marketing, and advertising under the mark, and sales in connection with the mark; knowledge of all aspects of Applicant's business operations and activities and of the market in which Applicant operates.</p>
<p>Daniel Serres Project Manager at Lucky Web Design</p> <p>Contact may be made through counsel listed below.</p>	<p>Knowledge of Applicant's mark including use of the mark, as well as Applicant's promotion, marketing, and advertising under the mark.</p>

B. Documents, Electronically Stored Information, and Tangible Things

Applicant hereby describes all documents, electronically stored information, and tangible things that are in its possession, custody, or control that it may use to support its claims and/or defenses. Applicant reserves the right to supplement or amend its responses as appropriate.

1. All documents and things attached as an exhibit to any pleading filed by Opposer or Applicant.
2. Correspondence, marketing and promotional materials, and other documents relating to Applicant's mark.

3. Electronically stored information, including emails, attachments, and other files maintained on Applicant's computers, relating to Applicant's mark.
4. Filings with the United States Patent and Trademark Office relating to Applicant's mark.
5. All documents and things provided by Applicant as part of its initial disclosures or in response to discovery propounded by Opposer.

Dated: April 8, 2021

Respectfully submitted,

DANIELS, RODRIGUEZ, BERKELEY,
DANIELS & CRUZ, P.A.
Attorneys for Applicant
490 Sawgrass Corporate Parkway, Suite 320
Sunrise, Florida 33325
Telephone No. (305) 448-7988

By: /s/ Lorne E. Berkeley, Esq.

LORNE E. BERKELEY, ESQ.
Florida Bar No. 146099
lberkeley@drbdc-law.com
ddames@drbdc-law.com
Counsel for Applicant Lunarlandowner.com, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT'S INITIAL DISCLOSURES has been served on Opposer's counsel, Stuart J. West, Esq., West & Associates, A PC, 3050 Citrus Circle, Suite 207, Walnut Creek, CA 94598, via Email: swest@westpatentlaw.com and trademark@westpatentlaw.com, on this 8th day of April, 2021.