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

Proceeding no.	91274911
Party	Defendant Marchel G. Chehade
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**UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD**

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Hoodrich Ltd.,

Plaintiff,

-against-

Proceeding No. 91274911

Marcel G. Chehade,

Defendant.

-----X

**APPLICANT'S OPPOSITION TO  
OPPOSER'S MOTION TO COMPEL**

Applicant Marcel G. Chegade hereby opposes Opposer Hoodrich Ltd.'s Motion to Compel with regard to Applicant's discovery responses.

Regarding Applicant's Answers to Interrogatories, Opposer argued that the responses to Interrogatories 4, 5, 8, and 9 were insufficient.

Please be advised that Applicant has now served Revised Answers to Interrogatories on February 16, 2023, thus it is Applicant's position that the pending motion is moot with regard to same. Specifically, Applicant revised its answer to Interrogatory Number 4 to specify a total of nine particular types of products that have yet to be sold under the mark. Applicant revised its answer to Interrogatory Number 5 to specify the approximate annual dollar volume of Applicant's sales in the United States of the goods listed in the subject application under the subject mark from 2018 to the present. Applicant revised its answer to Interrogatory Number 8 to specify the total dollar volume of Applicant's sales in the United States of specific types of goods bearing the subject mark from February 24, 2021 to the present. Finally, Applicant revised its answer to Interrogatory Number 9 to specify one example customer, together with contact information.

In addition, Applicant has now served supplemental document production. Such was comprised of representative samples of sales of products bearing the mark in question. Thus, it is Applicant's position that the pending motion is moot with regard to same as well.

In light of all of the above, it is respectfully submitted that Petitioner's Motion should be denied.

Dated: Calverton, New York  
February 17, 2023

/s/ Todd Wengrovsky  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2023, a copy of the foregoing Applicant's Opposition to Motion was electronically filed with the United States Patent and Trademark Office and that a copy was served via electronic mail on Petitioner's attorney of record:

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