

ESTTA Tracking number: **ESTTA1319346**Filing date: **10/31/2023**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding no.	91284522
Party	Defendant 1729 Investments LLC
Correspondence address	RANDY MICHELS TRUST TREE LEGAL, P.C. 798 BERRY ROAD #41400 NASHVILLE, TN 37204 UNITED STATES Primary email: randy@trusttree.com Secondary email(s): docket@trusttree.com 615-469-0438
Submission	Motion to Extend
Filer's name	Randy Michels
Filer's email	randy@trusttree.com
Signature	/JRM/
Date	10/31/2023
Attachments	Motion for Extension of Time to Respond to Discovery Requests v1.pdf(105307 bytes) Exhibit A to Motion for Extension.pdf(164136 bytes) Exhibit B to Motion for Extension Redacted.pdf(189937 bytes)

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

Rao's Specialty Foods, Inc.,)	
)	
Opposer,)	
)) Opposition No. 91284522
v.)) Serial No. 97/251,041
)) Mark: RAO MEKA
1729 Investments LLC,)	
)	
Applicant.)	
)	
)	
<hr style="border: 0.5px solid black;"/>		

**APPLICANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
OPPOSER'S DISCOVERY REQUESTS**

Applicant 1729 Investments LLC ("Applicant") hereby moves without Opposer's consent to extend the time period to respond or otherwise object to Opposer's First Set of Requests for Production of Documents and Things, Opposer's First set of Interrogatories to Applicant, and Opposer's First Set of Requests for Admission (collectively, "Opposer's Discovery Requests") by a period of fourteen (14) days, from November 6, 2023 to and including November 20, 2023, or, for a period of fourteen (14) days after the Board renders a decision on this motion, whichever date is later. Good cause exists for granting this Motion, as set forth further below.

ARGUMENT

I. Background

On October 5, 2023, Opposer served Opposer's Discovery Requests on Applicant. Copies of Opposer's Discovery Requests are attached as Exhibit A. Under Rules 33(b), 34(b), and 36(a) of the Federal Rules of Civil Procedure, and the Trademark Rules of Practice, § 2.120(a)(3), Applicant's Responses to Opposer's Discovery Requests are due November 6, 2023. *See* TBMP § 403.03.

Applicant is a single-member limited liability company. The single member, Rao Meka, left the country for a two-week European trip on October 17, 2023. Before Mr. Meka's departure, counsel for Applicant requested a two-week extension of the discovery response deadline. Opposer's counsel rejected the requested two-week extension on October 16, 2023. *See* email correspondence attached as Exhibit B. Instead, Opposer's counsel conditioned its consent to a one-week extension on Applicant consenting to Opposer's filing of an amended Notice of Opposition. However, a one-week extension is insufficient due to Rao Meka's travel plans and the broad scope of Opposer's Discovery Requests. Accordingly, Applicant hereby moves the Board for a two-week extension without Opposer's consent.

II. The Legal Standard: Good Cause

The standard for allowing an extension of a prescribed period prior to the expiration of that period is good cause. TBMP § 509.01. Moreover, the Board is liberal in granting extensions of time before the period to act has elapsed as long as the moving party is not guilty of negligence or bad faith and the privilege of extensions is not abused. *National Football League v. DNH Management, LLC*, 85 USPQ2d 1852, 1854 (TTAB 2008). Applicant's basis for filing this motion meets the good cause standard.

III. Applicant's Good Cause

This is Applicant's first request for an extension of time. Notably, Opposer has already filed two consented motions for extensions of time (Dkt. 5 and 8). While Applicant is currently gathering documents and information to respond to these requests, considering Rao Meka's travel plans and the broad scope of Opposer's requests, Applicant cannot provide adequate responses by the current response deadline.

In *American Vitamin Products Inc. v. DowBrands Inc.*, a cancellation proceeding before the Board, the petitioner requested additional time to answer the respondent's interrogatories on the basis that the petitioner was "continuing to gather information needed to respond to respondent's discovery requests." *American Vitamin Products Inc. v. DowBrands Inc.*, 22 U.S.P.Q.2d 1313, 1315 (TTAB 1992). The Board granted the petitioner's motion and concluded that the basis for the extension request was good cause sufficient to justify an extension of the time to respond to the outstanding discovery requests.

Similarly, Applicant is gathering information to respond to Opposer's Discovery Requests and this motion is made in good faith and not for purposes of delay. Opposer's Discovery Requests are broad in scope and require significant time to answer.

CONCLUSION

In light of the above arguments, Applicant respectfully requests the Board to grant Applicant's motion.

Respectfully submitted,

s/Randy Michels

Randy Michels

Bill Ferrell

Kevin Hartley

TRUST TREE LEGAL, P.C.

798 Berry Road #41400

Nashville, TN 37204

Telephone: (615) 469-0438

randy@trusttree.com

bill@trusttree.com

kevin@trusttree.com

docket@trusttree.com

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2023, pursuant to Trademark Rule 2.119, a copy of the foregoing was served on counsel for Opposer via email to:

Bassam N. Ibrahim
Laura K. Pitts
Bryce J. Maynard
Buchanan Ingersoll & Rooney PC
1737 King St., Suite 500
Alexandria, Virginia
22314-2727
(703) 836-6620
bassam.ibrahim@bipc.com
laura.pitts@bipc.com
bryce.maynard@bipc.com

s/Randy Michels
Attorney for Applicant

EXHIBIT A

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

Rao’s Specialty Foods, Inc.,)	
)	
Opposer,)	
)	
v.)	
)	Opposition No. 91284522
1729 Investments LLC,)	
)	
Applicant)	
)	

OPPOSER’S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and 37 C.F.R. §2.120, Rao’s Specialty Foods, Inc. (“Opposer”) hereby serves this First Set of Requests for Production of Documents and Things on 1729 Investments LLC (“Applicant”), and requests that Applicant produce the requested documents for inspection and copying at the offices of Opposer’s counsel, Buchanan Ingersoll & Rooney PC, 1727 King Street, Suite 500, Alexandria, VA 22314, within thirty (30) days.

DEFINITIONS

The following definitions apply to each of Opposer’s Requests for Production of Documents and Things, Interrogatories, and Requests for Admission served on Applicant in this proceeding.

1. “Applicant” means 1729 Investments LLC.
2. “Application” means U.S. Trademark Application Serial No. 97/251,041.
3. “Applicant’s Answer” means Applicant’s pleading filed in response to Opposer’s Notice of Opposition in this Proceeding, and any amended pleading that Applicant may subsequently file in this Proceeding.
4. “Applicant’s Mark” means the RAO MEKA mark as shown in the Application.

5. "Applicant's Goods" mean the goods listed in U.S. Application Serial No. 97/251,041, namely, "wine."
6. "Communications" mean every manner or means of disclosure, transfer or exchange of information, whether orally, by telephone, mail, e-mail, text or otherwise.
7. "Document" means every writing or record of any type and description that is or has been in the possession, control or custody of Applicant, of which Applicant has knowledge, including, without limitation, correspondence, memoranda, tapes, stenographic or handwritten notes, studies, publications, books, pamphlets, pictures, films, voice recordings, maps, reports, surveys, minutes, statistical compilations, trademark appraisals, trademark registrability or availability searches or reports, trademark infringement reports, opinions of counsel, and any other information-containing paper, writing or physical things; every copy if such writing or record where the original is not in the possession, custody, or control of Applicant; and every copy of every such writing or record where such copy is not an identical copy of an original or where such copy contains any commentary or notations whatsoever that did not appear on the original.
8. "Identify (With Respect to Persons)" when referring to a Person means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.
9. "Identify (With Respect to Documents)" when referring to a Document means to provide detailed enough information that the Document is readily identifiable by the receiving party. If the identified Document or range of Documents has been produced, please provide the Bates number or Bates range under which the Document has been produced. If the identified Document has not

produced, please so state.

10. "Notice of Opposition" means the Notice of Opposition filed by Opposer, which instituted the present Opposition No. 91284522, and any amended pleading that Opposer may file in this Proceeding.
11. "Opposer" means Rao's Specialty Foods, Inc. and its predecessors-in-interest, and any Person acting on behalf of Rao's Specialty Foods., Inc.
12. "Opposer's Marks" means each of Opposer's trademarks cited by Opposer as a basis for opposition in the Notice of Opposition, including without limitation, RAO'S, RAO'S and Design, RAO'S HOMEMADE, RAO'S HOMEMADE SINCE 1896 and Design, RAO'S HOMESTYLE SINCE 1896 and Design, and RAO'S MADE FOR HOME.
13. "Opposer's Goods" means the goods covered by the registrations cited by Opposer as a basis for opposition in the Notice of Opposition, including without limitation, Canned tomatoes; Edible oils; Olive oil; Preserved vegetables (in oil); Processed peppers; Pasta, pasta sauce, marinades, vinegar, wine vinegar, salad dressings; Sauces; Frozen pre-packaged entrees consisting primarily of seafood, meat, fish, poultry, or vegetables; Frozen pre-packaged entrees consisting primarily of pasta; Soup.
14. "Person" means any natural person or any business, legal or governmental entity or association.
15. "Proceeding" means this present Opposition No. 91284522.
16. "Use" shall mean use in commerce that is under the trademark owner's control, including by a licensee.
17. "Vineyard" means a piece of land with grapevines producing grapes for use in winemaking.
18. "Winery" means premises where wine is manufactured.
19. "You," "Your," or "1729 Investments" means 1729 Investments LLC, its predecessors in interest,

its subsidiary and related organizations, and the officers, directors, employees, agents and representatives thereof.

INSTRUCTIONS

The following instructions apply to each of Opposer's Requests for Production of Documents and Things, Interrogatories, and Requests for Admission served on Applicant in this proceeding.

1. All Documents are to be produced as they are kept in the usual course of business with any identifying labels, file markings, or similar identifying features, or shall be organized and labeled to correspond to the categories requested herein. If there are no documents in response to a particular request or if you withhold any responsive documents or categories of documents based on any objections, you shall state so in writing.
2. If any Document is withheld on the grounds of attorney-client, work-product, or other privilege, please provide a log that (i) identifies the Document with sufficient particularity, including a description of the Document (e.g., email, letter), subject matter, date and participants; and (ii) state the legal and factual basis for the claim of privilege.
3. The terms "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 of its scope.
4. The use of the singular form of any word shall be construed as including the plural and vice versa.
5. The term "date" means the exact day, month and year if ascertainable or, if not, the best approximation thereof (including chronological relationship to other events).
6. Pursuant to Rule 26(e) and Rule 34 of the Federal Rules of Civil Procedure, Registrant has a duty to supplement any prior response to the extent of Documents that subsequently come into

Registrant's possession, custody, or control, or become known to Registrant.

REQUESTS FOR PRODUCTION

DOCUMENT REQUEST NO. 1: All Documents referring or relating to the selection, adoption and clearance of Applicant's Mark, including, but not limited to, searches, investigations, reports and opinions.

DOCUMENT REQUEST NO. 2: All Documents and things relating or referring to, or evidencing, reflecting, or constituting the filing of the Application.

DOCUMENT REQUEST NO. 3: Documents sufficient to identify all Persons who were responsible for, participated in, or have information concerning the selection, use, or intent to use Applicant's Mark in connection with Applicant's Goods.

DOCUMENT REQUEST NO. 4: Documents sufficient to identify all channels of trade through which Applicant advertises, promotes, distributes, sells, offers, or licenses Applicant's Goods, or intends to advertise, promote, distribute, sell, offer, or license Applicant's Goods, under or in connection with Applicant's Mark.

DOCUMENT REQUEST NO. 5: Documents sufficient to show the meaning, connotation, or commercial impression of Applicant's Mark.

DOCUMENT REQUEST NO. 6: Documents sufficient to identify the target purchasers or potential purchasers of Applicant's Goods offered, distributed, licensed, or sold, or intended to be offered, distributed, licensed, or sold, by Applicant under or in connection with Applicant's Mark.

DOCUMENT REQUEST NO. 7: All Documents concerning Applicant's knowledge of Opposer or Opposer's Marks.

DOCUMENT REQUEST NO. 8: All Documents relating to any Communications concerning Opposer, Opposer's Marks, or Opposer's Goods in any way.

DOCUMENT REQUEST NO. 9: Documents sufficient to show all sales of Applicant's Goods under or in connection with Applicant's Mark in the United States.

DOCUMENT REQUEST NO. 10: All Documents evidencing or related to Applicant's bona fide intent to use Applicant's Mark in connection with Applicant's Goods.

DOCUMENT REQUEST NO. 11: All Documents reflecting or relating to any efforts made by Applicant to begin using Applicant's Mark in connection with Applicant's Goods on or before February 2, 2022.

DOCUMENT REQUEST NO. 12: All business plans reflecting or relating to Applicant's use or intent to use Applicant's Mark in connection with Applicant's Goods.

DOCUMENT REQUEST NO. 13: All Documents relating to any Communications or agreements with actual or potential U.S. distributors regarding distribution or sale of Applicant's Goods.

DOCUMENT REQUEST NO. 14: All Documents relating to any Communications or agreements with actual or potential manufacturers to produce Applicant's Goods, including without limitation, any Wineries.

DOCUMENT REQUEST NO. 15: All Documents relating to any Communications or agreements with actual or potential suppliers of ingredients for Applicant's Goods, including without limitation, any Vineyards.

DOCUMENT REQUEST NO. 16: All Documents relating to any Communications or agreements with third parties regarding the design of labels or product packaging for Applicant's Goods.

DOCUMENT REQUEST NO. 17: All Documents relating to Communications or agreements with third parties regarding advertising or promoting Applicant's Goods.

DOCUMENT REQUEST NO. 18: Representative samples of product packaging and product labels bearing Applicant's Mark.

DOCUMENT REQUEST NO. 19: Documents sufficient to show Applicant's capacity to produce wine under or in connection with Applicant's Mark as of February 2, 2022.

DOCUMENT REQUEST NO. 20: Documents sufficient to identify the Vineyard and/or Winery from which Applicant sources or intends to source grapes to produce wine under or in connection with Applicant's Mark.

DOCUMENT REQUEST NO. 21: Documents sufficient to identify the Vineyard and/or Winery where Applicant produces or intends to produce wine under or in connection with Applicant's Mark.

DOCUMENT REQUEST NO. 22: Documents sufficient to identify all designated vineyards in the Atlas Peak American Viticultural Area.

DOCUMENT REQUEST NO. 23: Documents sufficient to show the requirements for becoming a designated vineyard in the Atlas Peak American Viticultural Area and the specific standards that must be met in order to name the Atlas Peak American Viticultural Area.

DOCUMENT REQUEST NO. 24: Documents sufficient to identify the level of sophistication or degree of care of the average consumer of Applicant's Goods offered or intended to be offered under Applicant's Mark.

DOCUMENT REQUEST NO. 25: Representative samples of advertisement and promotional material (e.g., print, radio, television, brochures, catalogues, flyers, press releases, website pages, website banners, in-store displays, point-of-sale promotional items) used by Applicant to advertise or promote Applicant's Mark in connection with Applicant's Goods.

DOCUMENT REQUEST NO. 26: All documents and things identified in Applicant's Initial Disclosures.

DOCUMENT REQUEST NO. 27: All documents and things identified in Applicant's responses to Opposer's Interrogatories or that were reviewed or relied upon by Applicant in providing information for, or for verifying the responses to, Opposer's Interrogatories.

DOCUMENT REQUEST NO. 28: All documents and things, not otherwise responsive to any of the previous requests, that relate to any of the denials and Affirmative Defenses in Applicant's Answer.

Respectfully submitted,

Rao's Specialty Foods, Inc.

Date: October 5, 2023

By: /Laura K. Pitts/

Bassam N. Ibrahim

Laura K. Pitts

BUCHANAN INGERSOLL & ROONEY PC

1737 King Street, Suite 500

Alexandria, VA 22314

Telephone: 703-836-6620

bassam.ibrahim@bipc.com

laura.pitts@bipc.com

Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by email on October 5, 2023, to the correspondent of record for Applicant as follows:

Randy Michels
TRUST TREE LEGAL, P.C.
798 Berry Road, # 41400
Nashville, TN 37204
randy@trusttree.com
docket@trusttree.com

/Laura K. Pitts/

Laura K. Pitts

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

Rao’s Specialty Foods, Inc.,)	
)	
Opposer,)	
)	
v.)	
)	Opposition No. 91284522
1729 Investments LLC,)	
)	
Applicant)	
)	

OPPOSER’S FIRST SET OF INTERROGATORIES TO APPLICANT

Opposer Rao’s Specialty Foods, Inc. (“Opposer” or “Rao’s”), in accordance with Rule 33 and other applicable rules of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, request that the above-named Applicant, 1729 Investments LLC (“Applicant” or “1729 Investments”) respond to Opposer’s First Set of Interrogatories (“Interrogatories”) as set forth below. These Interrogatories shall be deemed continuing in nature pursuant to Rule 25(e)(2) of the Federal Rules of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

The definitions and instructions provided in the Requests for Production apply to and are deemed to be incorporated into each of the Interrogatories.

INTERROGATORY REQUESTS

INTERROGATORY NO. 1: Describe in detail all relevant facts and circumstances concerning the meaning of Applicant’s Mark and its relationship to Muktheswara Rao Meka, including whether Rao Meka is a surname.

INTERROGATORY NO. 2: Describe in detail all relevant facts and circumstances concerning Applicant’s decision to file U.S. App. Ser. No. 90694523 for the mark RAO’S on May 6, 2021.

INTERROGATORY NO. 3: Describe in detail all relevant facts and circumstances concerning Applicant's decision to file the Application for Applicant's Mark on February 2, 2022.

INTERROGATORY NO. 4: State Applicant's sales in dollars for Applicant's Goods sold under or in connection with Applicant's Mark for each year since Opposer first began using Opposer's Mark.

INTERROGATORY NO. 5: State Applicant's advertising in dollars for advertising and promoting Applicant's Goods sold under or in connection with Applicant's Mark for each year since Opposer first began advertising and promoting Opposer's Mark.

INTERROGATORY NO.6: Describe in detail all relevant facts and circumstances concerning how Applicant first learned of Opposer and/or Opposer's Marks.

INTERROGATORY NO.7: Identify the class or classes of current customers and prospective purchasers for Applicant's Goods, including age, gender, socioeconomic level and geographic location.

INTERROGATORY NO.8: Describe in detail all channels of trade through which Applicant offers or intends to offer Applicant's Goods under or in connection with Applicant's Mark.

INTERROGATORY NO.9: Identify all past and current locations where Applicant's Goods have been sold under or in connection with Applicant's Mark.

INTERROGATORY NO.10: Describe in detail Applicant's efforts to advertise, market, and promote Applicant's Goods under or in connection with Applicant's Mark.

INTERROGATORY NO.11: With respect to the goods set forth in the Application, set forth in detail the steps you have taken to begin use of Applicant's Mark.

INTERROGATORY NO.12: Describe Applicant's bona fide intent to use Applicant's Mark for Applicant's Goods at the time of filing the Application and identify all Documents concerning such intent.

INTERROGATORY NO.13: Set forth in detail all facts that support that Applicant has a bona fide intent to use Applicant's Mark in commerce with the goods specified in the Application.

INTERROGATORY NO.14: State whether Applicant has any documentation, including, without limitation, business plans, marketing plans, memos, correspondence or draft proposals of any kind reflecting Applicant's bona fide intent to use the Applicant's Mark in connection with Applicant's Goods.

INTERROGATORY NO.15: Describe in detail the legal and factual basis for Applicant's Section 18 defense as set forth in Paragraph 39 of Applicant's Answer.

INTERROGATORY NO.16: Define "wine specialty store" as used in Paragraph 39 of

Applicant's Answer and provide representative examples of stores that fall within that definition.

INTERROGATORY NO.17: Define "vineyard" as used in Paragraph 39 of Applicant's Answer and provide representative examples of "vineyards" that fall within that definition.

INTERROGATORY NO. 18: Define the "direct to consumers" channel of trade as used in Paragraph 39 of Applicant's Answer and provide representative examples of sellers or sales channels that fall within that definition.

INTERROGATORY NO. 19: Define "grocery stores" in Paragraph 39 of Applicant's Answer and provide representative examples of stores that fall within that definition.

INTERROGATORY NO. 20: Identify the single designated vineyard described in Paragraph 39 of Applicant's answer from which the grapes used to produce Applicant's Goods will be sourced and identify its relationship to Applicant.

INTERROGATORY NO. 21: Identify all designated vineyards in the Atlas Peak American Viticultural Area.

INTERROGATORY NO. 22: Describe in detail the requirements for becoming a designated vineyard in the Atlas Peak American Viticultural Area and the specific standards that must be met in order to name the Atlas Peak American Viticultural Area.

INTERROGATORY NO. 23: Describe in detail all relevant facts and circumstances concerning Applicant's background, capacity, and expertise to produce wine as of February 2, 2022.

INTERROGATORY NO. 24: Identify each Person who furnished any information used in answering the Interrogatories for each of the foregoing Interrogatories and the Documents consulted to obtain information to answer each of the Interrogatories.

Respectfully submitted,

Rao's Specialty Foods. Inc.

Date: October 5, 2023

By: /Laura K. Pitts/
Bassam N. Ibrahim
Laura K. Pitts
Attorneys for Opposer
Buchanan Ingersoll
&Rooney PC
1737 King Street, Suite 500
Alexandria, Virginia 22314-2727
Telephone: 703-836-6620

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by email on October 5, 2023, to the correspondent of record for Applicant as follows:

Randy Michels
TRUST TREE LEGAL, P.C.
798 Berry Road, # 41400
Nashville, TN 37204
randy@trusttree.com
docket@trusttree.com

/Laura K. Pitts/

Laura K. Pitts

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

Rao’s Specialty Foods, Inc.,)	
)	
Opposer,)	
)	
v.)	
)	Opposition No. 91284522
1729 Investments LLC,)	
)	
Applicant)	
)	

OPPOSER’S FIRST SET OF REQUESTS FOR ADMISSION

In accordance with Rule 36 of the Federal Rules of Civil Procedure and Rule 2.120(a) of the Trademark Rules of Practice, Rao’s Specialty Foods, Inc. (“Opposer”), requests that 1729 Investments LLC (“Applicant”), answer each of the requests for admission set forth below.

DEFINITIONS AND INSTRUCTIONS

The definitions and instructions provided in the Requests for Production apply to and are deemed to be incorporated into each of the Requests for Admission. Applicant is hereby advised that a failure to specifically deny any request will be taken as an admission of the truth.

REQUESTS FOR ADMISSION

1. Admit that RAO MEKA is a personal name.
2. Admit that RAO MEKA is a surname.
3. Admit that RAO is a surname.
4. Admit that You have not used the RAO MEKA trademark in commerce in connection with wine.
5. Admit that You have not sold any wine under the RAO MEKA trademark.

6. Admit that wine can be sold in general grocery stores.
7. Admit that wine can be sold in specialty grocery stores.
8. Admit that wine can be sold to consumers at vineyards.
9. Admit that vineyards can also sell food to consumers.
10. Admit that vineyards can also sell pre-packaged food items to consumers.
11. Admit that wine can be sold in wine specialty stores.
12. Admit that wine specialty stores can also sell food.
13. Admit that wine specialty stores can also sell pre-packaged food items.
14. Admit that wine can be sold through direct to consumer channels of trade.
15. Admit that food can also be sold through direct to consumer channels of trade.
16. Admit that pre-packaged food items can also be sold through direct to consumer channels of trade.
17. Admit that red wine vinegar is made from red wine.
18. Admit that balsamic vinegar is made from grapes.
19. Admit that Applicant does not intend to sell Applicant's Goods in grocery stores.
20. Admit that You do not own a Vineyard.
21. Admit that You do not own a Winery.
22. Admit that You have never produced wine.
23. Admit that You did not have the technological capacity to produce wine as of February 2, 2022.
24. Admit that You did not have any written marketing plans for the use of Applicant's Mark in connection with wine as of February 2, 2022.
25. Admit that You have not entered into a written agreement with any third Person to

produce wine under Applicant's Mark.

26. Admit that You have not entered into a written agreement with any third Person to sell or distribute wine under Applicant's Mark.

27. Admit that You were aware of Opposer's Mark when You filed the Application.

Respectfully submitted,

Rao's Specialty Foods. Inc.

Date: October 5, 2023

By: /Laura K. Pitts/
Bassam N. Ibrahim
Laura K. Pitts
Attorneys for Opposer
Buchanan Ingersoll &
Rooney PC
1737 King Street, Suite 500
Alexandria, Virginia 22314-2727
Telephone: 703-836-6620

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by email on October 5, 2023, to the correspondent of record for Applicant as follows:

Randy Michels
TRUST TREE LEGAL, P.C.
798 Berry Road, # 41400
Nashville, TN 37204
randy@trusttree.com
docket@trusttree.com

/Laura K. Pitts/

Laura K. Pitts

EXHIBIT B

Tuesday, October 31, 2023 at 15:34:00 Central Daylight Time

Subject: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Date: Monday, October 30, 2023 at 4:17:21 PM Central Daylight Time

From: Soenya Randolph on behalf of Laura K. Pitts

To: Randy Michels

CC: All Attorneys, All Attorneys, Bassam Ibrahim, Laura K. Pitts, Bryce Maynard, Florence J. Goodman, Soenya Randolph

Category: Opposing Counsel

Attachments: image001.png, image002.png, image003.png, image004.png, image005.png, image006.png, image007.png, image008.png, image009.png, image010.png, [P]'s FINAL - Rao Meka - motion to amend - clean (4855-4338-6764 v1).pdf

Dear Randy,

Further to this matter, attached is our Motion to Amend Pleading filed with the Board today.

Best regards,

Laura

Laura Pitts
Counsel

1737 King Street
Suite 500
Alexandria, VA 22314-2727
703 838 6526 (o)
laura.pitts@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Laura K. Pitts <laura.pitts@bipc.com>

Sent: Friday, October 27, 2023 10:13 AM

To: Randy Michels <randy@trusttree.com>

Cc: All Attorneys <legal@trusttree.com>; Bassam Ibrahim <bassam.ibrahim@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>

Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Randy,

Thanks for the update. We will wait until Monday to file the motion to give your client a few more days

to respond. If we don't hear from him by then, we will get the motion on file, but can always file a consent motion after if needed.

Best,
Laura

From: Randy Michels <randy@trusttree.com>
Sent: Friday, October 27, 2023 9:34 AM
To: Laura K. Pitts <laura.pitts@bipc.com>
Cc: All Attorneys <legal@trusttree.com>; Bassam Ibrahim <bassam.ibrahim@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>
Subject: Re: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Laura,

I am waiting for feedback from my client.

He is in Europe with very limited availability.

Randy

 **Randy Michels**
Co-Founder, Trademark Attorney
Trust Tree Legal, P.C.
798 Berry Road #41400
Nashville, TN 37204
(615) 469-0438
randy@trusttree.com
trusttree.com



From: Laura K. Pitts <laura.pitts@bipc.com>
Date: Thursday, October 26, 2023 at 3:35 PM
To: Randy Michels <randy@trusttree.com>
Cc: All Attorneys <legal@trusttree.com>, Bassam Ibrahim <bassam.ibrahim@bipc.com>, Bryce Maynard <bryce.maynard@bipc.com>, Florence J. Goodman <florence.goodman@bipc.com>, Soenya Randolph <soenya.randolph@bipc.com>
Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Randy,

As we have not heard back from you, we have moved forward with preparing a motion to amend the Notice of Opposition. A copy of the motion with the proposed amended pleadings is attached for your reference. If your client is willing to consent to the proposed amendments, please let us know at your

earliest convenience. Otherwise, we will proceed to file the motion with the Board tomorrow.

Separately, we note that your client recently filed a new trademark application for MEKA (Ser. No. 98227173). If your client is no longer interested in the opposed marks and/or would like to reopen settlement negotiations, please let us know. As previously discussed, we believe an amicable resolution is preferable to the time and expense associated with TTAB litigation, but that can become more difficult the deeper we get into a proceeding. If you would like to set up a call to further discuss, please let me know.

Best regards,

Laura

Laura Pitts
Counsel

1737 King Street
Suite 500
Alexandria, VA 22314-2727
703 838 6526 (o)
laura.pitts@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Laura K. Pitts

Sent: Monday, October 23, 2023 1:45 PM

To: Randy Michels <randy@trusttree.com>

Cc: All Attorneys <legal@trusttree.com>; Bassam Ibrahim <bassam.ibrahim@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>

Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Randy,

Following up on the below, please let us know if this is acceptable to your client.

Best,
Laura

From: Laura K. Pitts

Sent: Monday, October 16, 2023 6:59 PM

To: Randy Michels <randy@trusttree.com>

Cc: All Attorneys <legal@trusttree.com>; Bassam Ibrahim <bassam.ibrahim@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>

Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Dear Randy,

So long as your client is not interested in negotiating settlement, it is our client's desire for the proceedings to move forward (and avoid unnecessary delay) so that we can get the matter resolved as quickly as possible. That being said, we can agree to a one (1) week extension of your client's discovery deadlines if your client will consent to RSF's filing of an amended complaint in the RAO MEKA opposition to assert two additional claims, namely, the mark is primarily merely a surname and lack of bona fide intent. See FRCP 15(a); TBMP § 507.02. This will allow the parties to avoid unnecessary motion practice. See, e.g., TBMP § 507.02 ("[T]he Board liberally grants leave to amend pleadings at any stage of a proceeding when justice so requires.").

Please let us know if this is acceptable and we will prepare a consent motion/stipulation for your review and approval. If you have questions or would like to further discuss, please let me know.

Best regards,

Laura

Laura Pitts
Counsel

1737 King Street
Suite 500
Alexandria, VA 22314-2727
703 838 6526 (o)
laura.pitts@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Randy Michels <randy@trusttree.com>

Sent: Wednesday, October 11, 2023 7:01 PM

To: Laura K. Pitts <laura.pitts@bipc.com>

Cc: All Attorneys <legal@trusttree.com>; Bassam Ibrahim <bassam.ibrahim@bipc.com>; Laura K. Pitts <laura.pitts@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>

Subject: Re: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Laura,

My client is about to leave for a European vacation.

He returns to the U.S. on November 1.

We're going to need a couple of extra weeks to respond to the requests.

By my calculation, that would move the deadline from November 6 to November 20.

Please let me know if you're willing to extend the deadline to November 20.

Of course, we will be happy to reciprocate in the future.

Thanks,

Randy



Randy Michels

Co-Founder, Trademark Attorney

Trust Tree Legal, P.C.

798 Berry Road #41400

Nashville, TN 37204

(615) 469-0438

randy@trusttree.com

trusttree.com



From: Soenya Randolph <soenya.randolph@bipc.com> on behalf of Laura K. Pitts <laura.pitts@bipc.com>

Date: Thursday, October 5, 2023 at 11:38 AM

To: Randy Michels <randy@trusttree.com>

Cc: All Attorneys <legal@trusttree.com>, Bassam Ibrahim <bassam.ibrahim@bipc.com>, Laura K. Pitts <laura.pitts@bipc.com>, Bryce Maynard <bryce.maynard@bipc.com>, Florence J. Goodman <florence.goodman@bipc.com>, Soenya Randolph <soenya.randolph@bipc.com>

Subject: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Dear Randy:

Please see the attached following documents being serviced:

1. Opposer's Requests for Production
2. Opposer's First Set of Requests for Admission
3. Opposer's First Set of Interrogatories

Best regards,

Laura

Laura Pitts
Counsel

1737 King Street
Suite 500
Alexandria, VA 22314-2727
703 838 6526 (o)
laura.pitts@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Randy Michels <randy@trusttree.com>
Sent: Wednesday, August 23, 2023 8:13 PM
To: Laura K. Pitts <laura.pitts@bipc.com>
Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>
Subject: Re: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

For Settlement Purposes Only – Subject to FRE 408

Hi Laura,

In response to your question, my client's property is located at 4473 Atlas Peak Rd., Napa, CA 94558.

Randy



Randy Michels

Co-Founder, Trademark Attorney
Trust Tree Legal, P.C.
798 Berry Road #41400
Nashville, TN 37204
(615) 469-0438
randy@trusttree.com
trusttree.com



From: Laura K. Pitts <laura.pitts@bipc.com>
Date: Monday, August 21, 2023 at 5:34 PM
To: Randy Michels <randy@trusttree.com>
Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>, Florence J. Goodman <florence.goodman@bipc.com>, Soenya Randolph <soenya.randolph@bipc.com>
Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Randy,

Yes, let's set up a time to chat because it was my understanding that your client was willing to agree not to use RAO'S. I will circulate a dial-in.

In the meantime, can you please provide us with the address for your client's vineyard? We have been unable to locate it online.

Best,
Laura

From: Randy Michels <randy@trusttree.com>
Sent: Monday, August 21, 2023 6:25 PM
To: Laura K. Pitts <laura.pitts@bipc.com>
Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>
Subject: Re: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

For Settlement Purposes Only – Subject to FRE 408

Hi Laura,

Sorry for the delay.

I was out of the country, and I didn't have a chance to connect with my client until recently.

Unfortunately, my client is not seeing a path to settlement with the framework set out in your July 31 email.

That said, he's willing to limit his use and registration of the marks to wine. If that's of any interest, I'm happy to schedule a call for later this week to discuss. Here are some day/times that I'm available:

- Wednesday
 - 11 am eastern/10 am central
 - 4 pm eastern/3 pm central
- Thursday
 - 11 am eastern/10 am central
 - 2 pm eastern/1 pm central

Randy



Randy Michels

Co-Founder, Trademark Attorney
Trust Tree Legal, P.C.
798 Berry Road #41400
Nashville, TN 37204
(615) 469-0438
randy@trusttree.com
trusttree.com



From: Laura K. Pitts <laura.pitts@bipc.com>
Date: Monday, August 21, 2023 at 5:15 PM
To: Randy Michels <randy@trusttree.com>
Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>, Florence J. Goodman <florence.goodman@bipc.com>, Soenya Randolph <soenya.randolph@bipc.com>
Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Randy,

Please confirm if you have had a chance to review the below with your client. We are available at your convenience to discuss.

Best regards,

Laura

From: Laura K. Pitts
Sent: Wednesday, August 16, 2023 6:31 PM
To: Randy Michels <randy@trusttree.com>
Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>
Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Randy,

Following up, please let me know when you are available to discuss.

Best,
Laura

From: Laura K. Pitts
Sent: Tuesday, August 08, 2023 5:23 AM
To: Randy Michels <randy@trusttree.com>
Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>
Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

For Settlement Purposes Only; Subject to Rule 408

Dear Randy,

We look forward to receiving your comments regarding the below. Please let us know if you have any questions.

Best regards,

Laura

From: Laura K. Pitts
Sent: Monday, July 31, 2023 7:19 PM
To: Randy Michels <randy@trusttree.com>
Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>
Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

X [Redacted]

[Redacted]

[Redacted]

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

- [Redacted]
- [Redacted]
- [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Laura Pitts
Counsel

1737 King Street
Suite 500
Alexandria, VA 22314-2727
703 838 6526 (o)
laura.pitts@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Randy Michels <randy@trusttree.com>
Sent: Thursday, July 27, 2023 4:58 PM
To: Laura K. Pitts <laura.pitts@bipc.com>
Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>; Florence J. Goodman <florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>
Subject: Re: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

Hi Laura,

I can talk tomorrow (Friday) at 11 am eastern/10 am eastern if you want to call me then.

Thanks,

Randy

** Please note that I will be out of the office from July 31 to August 14. I will check my email during this time but will not reply as quickly as usual.



Randy Michels

Co-Founder, Trademark Attorney

Trust Tree Legal, P.C.

798 Berry Road #41400

Nashville, TN 37204

(615) 469-0438

randy@trusttree.com

trusttree.com



From: Laura K. Pitts <laura.pitts@bipc.com>

Date: Tuesday, July 25, 2023 at 6:21 PM

To: Randy Michels <randy@trusttree.com>

Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>, Florence J. Goodman <florence.goodman@bipc.com>, Soenya Randolph <soenya.randolph@bipc.com>

Subject: RE: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522; Our Ref: 0096607-000102

RULE 408

Hi Randy,

Following up on the below, we have had a chance to review this with our client and wanted to follow up with you on one point. Do you have time for a quick call this week so that we can get something to you in writing to pass onto your client? If so, please let me know date/times that work for you.

Best regards,

Laura

From: Soenya Randolph <soenya.randolph@bipc.com> **On Behalf Of** Laura K. Pitts

Sent: Wednesday, June 28, 2023 1:31 PM

To: Randy Michels <randy@trusttree.com>

Cc: Bassam Ibrahim <bassam.ibrahim@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>; Laura K. Pitts <laura.pitts@bipc.com>; Erin A. Napoleon <erin.napoleon@bipc.com>; Florence J. Goodman

<florence.goodman@bipc.com>; Soenya Randolph <soenya.randolph@bipc.com>

Subject: Service Copy - Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522;
Our Ref: 0096607-000102

Dear Randy,

Please find attached our Motion to Extend as filed with the Board today.

Further to our discussion, we will revert to you once we have reviewed this matter internally and will keep you posted in due course.

Best regards,

Laura

Laura Pitts
Counsel

1737 King Street
Suite 500
Alexandria, VA 22314-2727
703 838 6526 (o)
laura.pitts@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Laura K. Pitts <laura.pitts@bipc.com>

Sent: Tuesday, June 27, 2023 12:27 PM

To: Randy Michels <randy@trusttree.com>; Bassam Ibrahim <bassam.ibrahim@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>

Cc: Soenya Randolph <soenya.randolph@bipc.com>; Erin A. Napoleon <erin.napoleon@bipc.com>

Subject: RE: Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522

Hi Randy,

Thanks so much. I will call you today at 4:00 pm eastern.

Best regards,

Laura

From: Randy Michels <randy@trusttree.com>

Sent: Saturday, June 24, 2023 12:15 PM

To: Laura K. Pitts <laura.pitts@bipc.com>; Bassam Ibrahim <bassam.ibrahim@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>

Cc: Soenya Randolph <soenya.randolph@bipc.com>

Subject: Re: Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522

Hi Laura,

I'm available on Monday at 4 pm eastern/3 pm central.

If that works for you, you can give me a call then.

If that doesn't work, I'm also available on Tuesday at 4 pm eastern/3 pm central.

Thanks,

Randy



Randy Michels

Co-Founder, Trademark Attorney
Trust Tree Legal, P.C.
798 Berry Road #41400
Nashville, TN 37204
(615) 469-0438
randy@trusttree.com
trusttree.com



From: Laura K. Pitts <laura.pitts@bipc.com>

Date: Friday, June 23, 2023 at 2:11 PM

To: Randy Michels <randy@trusttree.com>, Bassam Ibrahim <bassam.ibrahim@bipc.com>, Bryce Maynard <bryce.maynard@bipc.com>

Cc: Soenya Randolph <soenya.randolph@bipc.com>

Subject: RE: Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522

Dear Randy,

Following up on the below, please let me know if you are available on Monday for the parties' discovery conference. If not, please advise as to your earliest availability.

Best regards,

Laura

Laura Pitts
Counsel

1737 King Street
Suite 500
Alexandria, VA 22314-2727
703 838 6526 (o)

laura.pitts@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Randy Michels <randy@trusttree.com>

Sent: Monday, May 22, 2023 4:59 PM

To: Bassam Ibrahim <bassam.ibrahim@bipc.com>; Laura K. Pitts <laura.pitts@bipc.com>; Bryce Maynard <bryce.maynard@bipc.com>

Subject: Rao's Specialty Foods, Inc. v. 1729 Investments LLC, Opposition No. 91284522

Attached is a copy of the Answer that was filed today in Opposition No. 91284522 along with a copy of the filing receipt.

Please let me know if you have any questions.

Thanks,

Randy



Randy Michels

Co-Founder, Trademark Attorney

Trust Tree Legal, P.C.

798 Berry Road #41400

Nashville, TN 37204

(615) 469-0438

randy@trusttree.com

trusttree.com



CONFIDENTIAL/PRIVILEGED INFORMATION: This e-mail message (including any attachments) is a private communication sent by a law firm and may contain confidential, legally privileged or protected information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is prohibited and may be unlawful. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system.

CONFIDENTIAL/PRIVILEGED INFORMATION: This e-mail message (including any attachments) is a private communication sent by a law firm and may contain confidential, legally privileged or protected information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is prohibited and may be unlawful. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system.

CONFIDENTIAL/PRIVILEGED INFORMATION: This e-mail message (including any attachments) is a private communication sent by a law firm and may contain confidential, legally privileged or protected information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is prohibited and may be unlawful. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system.

CONFIDENTIAL/PRIVILEGED INFORMATION: This e-mail message (including any attachments) is a private communication sent by a law firm and may contain confidential, legally privileged or protected information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is prohibited and may be unlawful. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system.

CONFIDENTIAL/PRIVILEGED INFORMATION: This e-mail message (including any attachments) is a private communication sent by a law firm and may contain confidential, legally privileged or protected information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is prohibited and may be unlawful. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system.

CONFIDENTIAL/PRIVILEGED INFORMATION: This e-mail message (including any attachments) is a private communication sent by a law firm and may contain confidential, legally privileged or protected information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is prohibited and may be unlawful. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system.

CONFIDENTIAL/PRIVILEGED INFORMATION: This e-mail message (including any attachments) is a private communication sent by a law firm and may contain confidential, legally privileged or protected information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is prohibited and may be unlawful. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system.