

ESTTA Tracking number: **ESTTA1421031**  
Filing date: **03/12/2025**

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

Proceeding no.	91288715
Party	Plaintiff National Academy of Recording Arts & Sciences, Inc.
Correspondence address	JOEL R. FELDMAN GREENBERG TRAUIG, LLP 3333 PIEDMONT RD. NE. SUITE 2500 ATLANTA, GA 30305 UNITED STATES Primary email: atltrademark@gtlaw.com Secondary email(s): joel.feldman@gtlaw.com, holta@gtlaw.com 678-553-4778
Submission	Motion to Compel Discovery or Disclosure
Filer's name	Joel R. Feldman
Filer's email	atltrademark@gtlaw.com, Joel.Feldman@gtlaw.com
Signature	/jrf/
Date	03/12/2025
Attachments	91288715 - Motion to Compel.pdf(5180988 bytes )

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

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NATIONAL ACADEMY OF RECORDING	)	)	
ARTS & SCIENCES, INC.,	)	)	
	)	)	
<b>Opposer,</b>	)	)	
	)	)	
v.	)	)	<b>Opposition No. 91288715</b>
	)	)	
GRANNY THE LABEL LLC,	)	)	
	)	)	
<b>Applicant.</b>	)	)	
<hr/>		)	

**OPPOSER’S MOTION TO COMPEL  
APPLICANT’S RESPONSES TO DOCUMENT REQUESTS  
AND DOCUMENT PRODUCTION**

Pursuant to TBMP § 523, Opposer National Academy of Recording Arts & Sciences, Inc. moves the Board to compel Applicant Granny the Label LLC to respond to Request Nos. 1, 6, 7, 8, 13-26, and 29 of Opposer’s First Request for Production of Documents (each, an “RFP” and collectively, the “RFPs”), served on August 30, 2024, and produce all responsive documents without objection.

**I. Background**

The reset discovery period<sup>1</sup> in this proceeding opened on August 30, 2024. On that day, Opposer served its initial disclosures and propounded, *inter alia*, the RFPs on Applicant.<sup>2</sup> Applicant’s responses to the RFPs were due on September 30, 2024. After several dilatory

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<sup>1</sup> The initial discovery period in this proceeding was scheduled to open on February 20, 2024. 2 TTABVUE 3. The Board issued a notice of default on February 1, 2024 because Applicant did not timely file an Answer. *See* 4 TTABVUE 1. On February 26, 2024, Applicant filed a “Re[s]ponse to Default and Request for 90 Day Extension to Respond.” 5 TTABVUE 2. Ultimately, the Board issued a new scheduling order on June 27, 2024 under which discovery opened August 30, 2024. 14 TTABVUE 10.

<sup>2</sup> *See* Exhibit 1.

and/or defective filings,<sup>3</sup> Applicant “filed,” but did not serve, interrogatory responses on November 4, 2024.<sup>4</sup>

**II. Opposer’s good-faith efforts to discuss and resolve repeated deficiencies, including the current deficient written responses to Opposer’s RFPs**

On November 5, 2024, Opposer’s counsel sent Applicant’s counsel an email stating, in pertinent part, “As of today, Applicant’s (i) initial disclosures, (ii) written responses to Opposer’s First Requests for Production of Documents, and (iii) document production are all long overdue. Please promptly respond to this email to let me know when you will be serving (i), (ii), and (iii).”<sup>5</sup> Opposer’s counsel followed up with Applicant’s counsel on November 25, 2024<sup>6</sup> and December 26, 2024<sup>7</sup>. Finally, on December 27, 2024, Applicant’s counsel responded, in pertinent part, that “I’m not sure where the miscommunication has arisen because I understood that my office had responded on behalf of my client to each of your requests.”<sup>8</sup> The parties conferred by phone on December 30, 2024, after which Opposer’s counsel resent the RFPs to Applicant’s counsel.<sup>9</sup>

On January 6, 2025, Applicant’s counsel served written responses to Opposer’s RFPs,<sup>10</sup> along with a cover email<sup>11</sup> and six documents. The cover email stated, in pertinent part, “I was able to get the following information from my client Friday evening, but upon review, I believe that the responses require amendment and supplementation. Please, bear with me, as I attempt to make certain that all requested information received an appropriate response/production.”

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<sup>3</sup> See 21 TTABVUE; 24 TTABVUE.

<sup>4</sup> See 28 TTABVUE; 29 TTABVUE.

<sup>5</sup> See Exhibit 2.

<sup>6</sup> See Exhibit 3.

<sup>7</sup> See Exhibit 4.

<sup>8</sup> See Exhibit 5.

<sup>9</sup> See Exhibit 6.

<sup>10</sup> See Exhibit 7.

<sup>11</sup> See Exhibit 8.

Optimistic, Opposer’s counsel was patient. But having heard nothing in over a month and with the end of the discovery period less than two months away, Opposer’s counsel sent an email chasing the promised supplementation of Applicant’s written responses to Opposer’s RFPs and supplemental document production.<sup>12</sup> After another week of radio silence, Opposer’s counsel followed up, noting, in pertinent part, “As you know, the Board disfavors having to adjudicate motions to compel. My emails are a good-faith effort to resolve the need for the Board to intervene and compel applicant’s RFP responses and document production. Please provide an update on when the supplemental responses and document production will be delivered. If you do not respond to my emails and/or applicant’s supplemental RFP responses and document production are not delivered by March 3, 2025, then I will have no choice but to ask the Board to intervene.”<sup>13</sup> As of the filing of this motion to compel, Applicant’s counsel has not responded to any of these emails, supplemented Applicant’s responses to Opposer’s RFPs, or produced additional documents.

Opposer made a good-faith effort, by correspondence (and a prior phone call), to resolve Applicant’s failure to properly respond to 19 of Opposer’s 30 RFPs and failure to produce responsive documents. Nevertheless, because of Applicant’s counsel’s non-responsiveness, Opposer must now seek the Board’s intervention to keep this proceeding moving forward.

### **III. Applicant’s deficient written RFP responses and document production**

In response to 16 of Opposer’s 30 requests for production – RFP Nos. 6, 7, 8, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26, and 29 – Applicant responded “(DECLINE)” and did not produce any documents.<sup>14</sup> Each of Opposer’s requests for production seeks discoverable

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<sup>12</sup> See Exhibit 9.

<sup>13</sup> See Exhibit 10.

<sup>14</sup> See Exhibit 7.

information. Under Fed. R. Civ. P. 32(b)(2)(B), “[f]or each item or category, the response must either state that inspection and related activities will be permitted as requested or state with specificity the grounds for objecting to the request, including the reasons. The responding party may state that it will produce copies of documents or of electronically stored information instead of permitting inspection. The production must then be completed no later than the time for inspection specified in the request or another reasonable time specified in the response.” “DECLINE” is not a statement that inspection and related activities will be permitted as requested. “DECLINE” is not a statement that Applicant will produce copies of documents instead of permitting inspection. And “DECLINE” is not specific grounds for objecting to the requests. Accordingly, “DECLINE” is non-responsive and deficient and the failure to produce documents in response to these requests is further deficient.

Applicant did not respond to RFP No. 1. In response to RFP No. 13, Applicant stated “(Podcast, manufacture vinyl, cassettes and cd’s).” And in response to RFP No. 22, Applicant stated “(NO).” None of these statements comply with Fed. R. Civ. P. 32(b)(2)(B), quoted above. Accordingly, each of these statements is non-responsive to the corresponding RFP and both the statement and failure to produce documents is deficient.

#### **IV. Requests for Relief**

Opposer moves the Board to issue an order directing Applicant:

1. to serve supplemental (and full) responses to RFP Nos. 1, 6, 7, 8, 13-26, and 29 without objection;<sup>15</sup> and

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<sup>15</sup> See TBMP Rule 403.03 (“A party which fails to respond to a request for discovery during the time allowed therefor, and which is unable to show that its failure was the result of excusable neglect, may be found, upon motion to compel filed by the propounding party, to have forfeited its right to object to the discovery request on its merits”).

2. to produce responsive documents by e-mail or file transfer.<sup>16</sup>

While the Board considers Opposer's motion to compel, Opposer requests the Board suspend the proceeding.<sup>17</sup>

Respectfully submitted,  
**GREENBERG TRAURIG, LLP**



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Joel Feldman  
Alexandra Holt  
Kristen Van Dyke

3333 Piedmont Road, NE, Suite 2500  
Atlanta, GA 30305  
Phone: (678) 553-4778

*Attorneys for Opposer*  
*National Academy of Recording Arts &*  
*Sciences, Inc.*

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<sup>16</sup> See TBMP Rule 406.04(b) (granting the Board authority to order the place and manner in which documents are to be produced).

<sup>17</sup> Notably, on February 20, 2025, Opposer served a notice of taking Applicant's 30(b)(6) deposition. Opposer will serve an amended notice of deposition after the Board has granted the motion to compel or the parties have otherwise resolved Applicant's deficiency and Applicant has properly responded to the RFPs and produced documents so that Opposer can properly prepare for the deposition and have time for follow-up discovery before the end of the discovery period.

**CERTIFICATE OF SERVICE**

I certify that on March 12, 2025, I served the foregoing Opposer's Motion to Compel Applicant's Responses to Document Requests and Document Production by electronic mail to:

Richard Sulaka  
**SULAKA LAW**  
39500 High Pointe Blvd.  
Novi, MI 48375  
[rps@sulakalaw.com](mailto:rps@sulakalaw.com)  
[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)



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Joel Feldman

# Exhibit 1

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

<hr/>		)	
<b>NATIONAL ACADEMY OF RECORDING</b>	)	)	
<b>ARTS &amp; SCIENCES, INC.,</b>	)	)	
	)	)	
<b>Opposer,</b>	)	)	
	)	)	
v.	)	)	<b>Opposition No. 91288715</b>
	)	)	
<b>GRANNY THE LABEL LLC,</b>	)	)	
	)	)	
<b>Applicant.</b>	)	)	
<hr/>		)	

**OPPOSER’S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

Opposer National Academy of Recording Arts & Sciences, Inc.’s first requests for production of documents are below. Under TBMP Rule 403.03, Applicant Granny the Label LLC must serve its written replies to these requests for production on or before **September 30, 2024**. Please send written responses and copies of all documents to Opposer’s counsel at [Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) and [HoltA@gtlaw.com](mailto:HoltA@gtlaw.com).

**INSTRUCTIONS AND DEFINITIONS**

- A. “Branded Goods” means one or more Class 9 Goods branded with the Mark.
- B. “Class 9 Goods” means, collectively, audio and video recordings featuring music and artistic performances; compact discs featuring music; computer hardware and downloadable and recorded computer software for processing digital music files; digital materials, namely, CDs, DVDs and downloadable digital audio files featuring music; digital music downloadable from the internet; downloadable video recordings featuring music; musical sound recordings; musical video recordings; phonograph records featuring music; downloadable ring tones for mobile phones; downloadable ring tones, graphics and music via a global computer network and wireless devices.
- C. “Document” or “Documents” means all printed documents (including photographs) or electronic documents (including sound, video, and data files) in Applicant’s possession, custody, or control. Documents includes written and electronic correspondence, memorandums, facsimiles, reports, transcripts, notes, minutes, diagrams, computer printouts, drawings, graphs, charts, and artwork.
- D. “Mark” means the literal component GRANNY THE LABEL in any stylization or format, whether alone or as part of a composite mark.
- E. “Opposer” means National Academy of Recording Arts & Sciences, Inc.

- F. “Person” means any natural person, business, legal entity, governmental entity, or association.
- G. “You” or “Your” means Granny the Label LLC and any Person acting on its behalf.
- H. If You contend that You are entitled to withhold from production the whole or any part of any responsive Documents on the basis of the attorney-client privilege, the work-product doctrine, or other grounds, for each such Document: (a) state the nature of the document; (b) state the date of the document; (c) identify the sender, author, and all recipients of the document; (d) summarize the subject matter of the document; and (e) state the basis on which you contend you are entitled to withhold the document from production.
- I. If You object to a document request, You must produce all Documents covered by the request that are not covered by the objection. Similarly, if You object to producing any portion of a Document, You must produce all portions of the Document that are not covered by the objection.

### **REQUESTS FOR PRODUCTION**

- 1. All non-privileged Documents dated on or before September 13, 2023 (the date Opposer filed an extension of time to oppose the application) referring or relating to Opposer or the GRAMMY® brand.
- 2. Documentary evidence sufficient to identify Your owners.
- 3. Documentary evidence sufficient to identify Your managers.
- 4. Documentary evidence sufficient to identify Your members.
- 5. A specimen of the use of the Mark on or in connection with any of the Class 9 Goods.
- 6. All non-privileged Documents related to the selection of the Mark, including brainstorming notes, emails, presentations, and internal communications.
- 7. Any research, including trademark research reports, conducted regarding the Mark.
- 8. Documentary evidence sufficient to verify Your internal and external written instructions regarding the creation of any stylized mark incorporating the component GRANNY (i.e., with or without the additional components “THE LABEL”).
- 9. Documentary evidence sufficient to verify Your first use in commerce of the Mark on or in connection with any good or service.
- 10. Documentary evidence sufficient to verify Your first use in commerce of the Mark on or in connection with any of the Class 9 Goods.
- 11. Documentary evidence sufficient to verify each type of Branded Goods You are currently offering.

12. Documentary evidence sufficient to verify each type of Branded Goods You previously offered by are not currently offering.
13. Documentary evidence sufficient to verify each type of Branded Goods You have a *bona intent* to offer but have not offered yet.
14. Documentary evidence sufficient to verify Your U.S. sales figures (by volume and dollar value) for Branded Goods, if any.
15. Documentary evidence sufficient to verify Your U.S. advertising expenditures for Branded Goods.
16. Documentary evidence sufficient to verify Your U.S. promotional expenditures other than advertising for Branded Goods.
17. Representative samples of each type (*e.g.*, print, online, etc.) of advertisement for the Branded Goods You have displayed or distributed.
18. Representative samples of press releases discussing You or the Branded Goods.
19. Representative samples (at least ten) of solicitations You have sent to a third party requesting that the third party sell, stream, or perform Your sound recordings.
20. Representative samples (at least five) of solicitations You have sent to musical artists requesting that they become a musical artist on Your music label.
21. Documents related to Your registration with any online music platform for the purpose of distributing Your Branded Goods.
22. Any submissions of Your music label's sound recordings for awards consideration.
23. All plans and strategies You have created (including goals, marketing plans, promotional plans, sales plans, target markets, and positioning) relating to Your Branded Goods.
24. All internal and external communications relating to positioning Your music label within the music industry.
25. Presentations You have prepared for any Person (including media outlets, potential investors, funding sources, endorsers, distributors, retailers, employees, customers, potential customers, or partners), whether presented or not, relating to the Branded Goods.
26. Agreements (including, but not limited to, assignment agreements, license agreements, settlement agreements, coexistence agreements, sponsorship agreements, and consent agreements) referencing the Mark.
27. Agreements between You and the owner of the GRANNY SMALLS mark (if not You).

28. Documentary evidence sufficient to verify each instance in which You attempted to enforce intellectual property rights in the Mark and the outcome of Your efforts.
29. All non-privileged internal correspondence referencing, in any manner, Opposer or Opposer's GRAMMY® mark.
30. Documentary evidence sufficient to identify any instance of consumer confusion between You and Opposer or its GRAMMY® mark.

Date: August 30, 2024

Respectfully submitted,  
**GREENBERG TRAURIG, LLP**



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Joel Feldman  
Alexandra Holt  
Kristen Van Dyke

3333 Piedmont Road, NE, Suite 2500  
Atlanta, GA 30305  
Phone: (678) 553-4778

*Attorneys for Opposer  
National Academy of Recording Arts &  
Sciences, Inc.*

**CERTIFICATE OF SERVICE**


I certify that on August 30, 2024, I served the foregoing Opposer's First Requests for Production of Documents by electronic mail to:

Mark Dempsey  
10701 Nottingham  
Detroit, MI 48224

*lilrapthename@gmail.com*  
*markhickspromo@gmail.com*

with copies to:

*msulaka@diamondstrategy.law*  
*msulaka@gmail.com*  
*rps@sulakalaw.com*



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Joel Feldman

# Exhibit 2

## Feldman, Joel (Shld-Atl-IP-Tech)

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**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Tuesday, November 5, 2024 12:06 PM  
**To:** rps@sulakalaw.com; Mark  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech); AtlTrademark  
**Subject:** National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715  
**Attachments:** RE: Recording Academy v. Granny the Label LLC, Opposition No. 91288715 - Recording Academy's Initial Disclosures .msg

Dear Mr. Sulaka,

I am writing regarding applicant's discovery response obligations in the above-referenced opposition proceeding.

On August 30, 2024, I served (1) Opposer's First Set of Interrogatories and (2) Opposer's First Requests for Production of Documents. The deadline to respond to this written discovery was September 30, 2024.

On September 30, 2024, Mr. Dempsey filed and served an unconsented motion to extend the deadline for applicant to respond to the written discovery by 30 days. As set forth in the Board's October 22, 2024 order, this motion was ultimately given no consideration because you did not refile it.

On November 4, 2024, you filed (but did not serve) written responses to Opposer's First Set of Interrogatories.

As of today, Applicant's (i) initial disclosures, (ii) written responses to Opposer's First Requests for Production of Documents, and (iii) document production are all long overdue. Please promptly respond to this email to let me know when you will be serving (i), (ii), and (iii).

Sincerely,  
Joel Feldman

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group

Greenberg Traurig, LLP  
Terminus 200 | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
T +1 678.553.4778 | F +1 678.553.4779  
[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



# Exhibit 3

## **Feldman, Joel (Shld-Atl-IP-Tech)**

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**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Monday, November 25, 2024 12:44 PM  
**To:** rps@sulakalaw.com; Mark  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech); AtlTrademark  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715  
**Attachments:** RE: Recording Academy v. Granny the Label LLC, Opposition No. 91288715 - Recording Academy's Initial Disclosures .msg

Dear Mr. Sulaka,

I am writing to follow up on my email below.

There are still three outstanding and long-overdue discovery obligations of Applicant:

- (i) Initial disclosures;
- (ii) Written responses to Opposer's First Requests for Production of Documents; and
- (iii) Applicant's document production.

Please provide me two times on Wednesday, November 27th and/or Monday, December 2nd when you are available to meet and confer regarding Applicant's discovery delinquencies.

Sincerely,  
Joel Feldman

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group  
T +1 678.553.4778

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech) <Joel.Feldman@gtlaw.com>  
**Sent:** Tuesday, November 5, 2024 12:06 PM  
**To:** rps@sulakalaw.com; Mark <markhickspromo@gmail.com>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <holta@gtlaw.com>; AtlTrademark <trademarkatl@gtlaw.com>  
**Subject:** National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

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On September 30, 2024, Mr. Dempsey filed and served an unconsented motion to extend the deadline for applicant to respond to the written discovery by 30 days. As set forth in the Board's October 22, 2024 order, this motion was ultimately given no consideration because you did not refile it.

On November 4, 2024, you filed (but did not serve) written responses to Opposer's First Set of Interrogatories.

As of today, Applicant's (i) initial disclosures, (ii) written responses to Opposer's First Requests for Production of Documents, and (iii) document production are all long overdue. Please promptly respond to this email to let me know when you will be serving (i), (ii), and (iii).

Sincerely,  
Joel Feldman

**Joel R. Feldman**

Shareholder; Co-Chair, Trademark & Brand Management Group

Greenberg Traurig, LLP  
Terminus 200 | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
T +1 678.553.4778 | F +1 678.553.4779  
[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



# Exhibit 4

## Feldman, Joel (Shld-Atl-IP-Tech)

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Thursday, December 26, 2024 2:37 PM  
**To:** rps@sulakalaw.com; Mark  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech); AtlTrademark  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715  
**Attachments:** RE: Recording Academy v. Granny the Label LLC, Opposition No. 91288715 - Recording Academy's Initial Disclosures .msg  
**Importance:** High

Dear Mr. Sulaka,

This is my third good-faith effort, by correspondence, to resolve Applicant's discovery delinquencies. If you do not respond with your availability for a telephone conference next week, I will have no choice but to file a motion to compel with the Board. **Please provide three times you are available next week to discuss three outstanding and long-overdue discovery obligations of Applicant:**

- (i) Initial disclosures;
- (ii) Written responses to Opposer's First Requests for Production of Documents; and
- (iii) Applicant's document production.

Sincerely,  
Joel Feldman

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group  
T +1 678.553.4778

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Monday, November 25, 2024 12:44 PM  
**To:** rps@sulakalaw.com; Mark <markhickspromo@gmail.com>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <holta@gtlaw.com>; AtlTrademark <trademarkatl@gtlaw.com>  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

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- (iii) Applicant's document production.

Please provide me two times on Wednesday, November 27th and/or Monday, December 2nd when you are available to meet and confer regarding Applicant's discovery delinquencies.

Sincerely,  
Joel Feldman

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group  
T +1 678.553.4778

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>  
**Sent:** Tuesday, November 5, 2024 12:06 PM  
**To:** [rps@sulakalaw.com](mailto:rps@sulakalaw.com); Mark <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; AtITrademark <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

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On August 30, 2024, I served (1) Opposer's First Set of Interrogatories and (2) Opposer's First Requests for Production of Documents. The deadline to respond to this written discovery was September 30, 2024.

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Sincerely,  
Joel Feldman

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group

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Terminus 200 | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
T +1 678.553.4778 | F +1 678.553.4779  
[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



# Exhibit 5

## Feldman, Joel (Shld-Atl-IP-Tech)

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**From:** Rich Sulaka <rich@sulakalaw.com>  
**Sent:** Friday, December 27, 2024 5:26 PM  
**To:** Feldman, Joel (Shld-Atl-IP-Tech); markhickspromo@gmail.com  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech); AtlTrademark  
**Subject:** Re: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

**\*EXTERNAL TO GT\***

Mr. Feldman,

I'm not sure where the miscommunication has arisen because I understood that my office had responded on behalf of my client to each of your requests. In any event, I'm available on the following dates and times next week in order to expeditiously address any outstanding concerns:

Monday, December 30, 2024 at 1 pm EST  
Thursday, January 2, 2025 at 2 pm EST  
Friday, January 3, 2025 at 11 am EST

Please, let me know if any of those dates/times work for you.

Warm Regards,

Rich Sulaka

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**From:** Joel.Feldman@gtlaw.com <Joel.Feldman@gtlaw.com>  
**Sent:** Thursday, December 26, 2024 2:36 PM  
**To:** Rich Sulaka <rich@sulakalaw.com>; markhickspromo@gmail.com <markhickspromo@gmail.com>  
**Cc:** holta@gtlaw.com <holta@gtlaw.com>; trademarkatl@gtlaw.com <trademarkatl@gtlaw.com>  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

Dear Mr. Sulaka,

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- (ii) Written responses to Opposer's First Requests for Production of Documents; and
- (iii) Applicant's document production.

Sincerely,  
Joel Feldman

**Joel R. Feldman**

Shareholder; Co-Chair, Trademark & Brand Management Group  
T +1 678.553.4778

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech)

**Sent:** Monday, November 25, 2024 12:44 PM

**To:** rps@sulakalaw.com; Mark <markhickspromo@gmail.com>

**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <holta@gtlaw.com>; AtITrademark <trademarkatl@gtlaw.com>

**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

Dear Mr. Sulaka,

I am writing to follow up on my email below.

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- (i) Initial disclosures;
- (ii) Written responses to Opposer's First Requests for Production of Documents; and
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**From:** Feldman, Joel (Shld-Atl-IP-Tech) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>

**Sent:** Tuesday, November 5, 2024 12:06 PM

**To:** rps@sulakalaw.com; Mark <markhickspromo@gmail.com>

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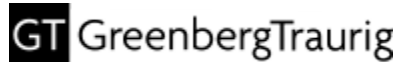
Shareholder; Co-Chair, Trademark & Brand Management Group

Greenberg Traurig, LLP

Terminus 200 | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305

T +1 678.553.4778 | F +1 678.553.4779

[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



---

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at [postmaster@gtlaw.com](mailto:postmaster@gtlaw.com), and do not use or disseminate the information.

# Exhibit 6

## Feldman, Joel (Shld-Atl-IP-Tech)

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Monday, December 30, 2024 1:17 PM  
**To:** 'Rich Sulaka'  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech); AtlTrademark; markhickspromo@gmail.com  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715  
**Attachments:** 91288715 - Opposer's First Requests for Production.pdf

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Joel

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group  
T +1 678.553.4778

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**From:** Rich Sulaka <rich@sulakalaw.com>  
**Sent:** Monday, December 30, 2024 9:56 AM  
**To:** Feldman, Joel (Shld-Atl-IP-Tech) <Joel.Feldman@gtlaw.com>; markhickspromo@gmail.com  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <holta@gtlaw.com>; AtlTrademark <trademarkatl@gtlaw.com>  
**Subject:** Re: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

**\*EXTERNAL TO GT\***

Following-up on your request.

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**Sent:** Friday, December 27, 2024 5:26 PM  
**To:** [Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>; [markhickspromo@gmail.com](mailto:markhickspromo@gmail.com) <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
**Cc:** [holta@gtlaw.com](mailto:holta@gtlaw.com) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; [trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com) <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
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**From:** [Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>

**Sent:** Thursday, December 26, 2024 2:36 PM

**To:** Rich Sulaka <[rich@sulakalaw.com](mailto:rich@sulakalaw.com)>; [markhickspromo@gmail.com](mailto:markhickspromo@gmail.com) <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>

**Cc:** [holta@gtlaw.com](mailto:holta@gtlaw.com) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; [trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com) <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>

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# Exhibit 7

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

<hr/>		)
NATIONAL ACADEMY OF RECORDING	)	)
ARTS & SCIENCES, INC.,	)	)
	)	)
<b>Opposer,</b>	)	)
	)	)
v.	)	<b>Opposition No. 91288715</b>
	)	)
GRANNY THE LABEL LLC,	)	)
	)	)
<b>Applicant.</b>	)	)
<hr/>		)

**OPPOSER’S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

Opposer National Academy of Recording Arts & Sciences, Inc.’s first requests for production of documents are below. Under TBMP Rule 403.03, Applicant Granny the Label LLC must serve its written replies to these requests for production on or before **September 30, 2024**. Please send written responses and copies of all documents to Opposer’s counsel at [Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) and [HoltA@gtlaw.com](mailto:HoltA@gtlaw.com).

**INSTRUCTIONS AND DEFINITIONS**

- A. “Branded Goods” means one or more Class 9 Goods branded with the Mark.
- B. “Class 9 Goods” means, collectively, audio and video recordings featuring music and artistic performances; compact discs featuring music; computer hardware and downloadable and recorded computer software for processing digital music files; digital materials, namely, CDs, DVDs and downloadable digital audio files featuring music; digital music downloadable from the internet; downloadable video recordings featuring music; musical sound recordings; musical video recordings; phonograph records featuring music; downloadable ring tones for mobile phones; downloadable ring tones, graphics and music via a global computer network and wireless devices.
- C. “Document” or “Documents” means all printed documents (including photographs) or electronic documents (including sound, video, and data files) in Applicant’s possession, custody, or control. Documents includes written and electronic correspondence, memorandums, facsimiles, reports, transcripts, notes, minutes, diagrams, computer printouts, drawings, graphs, charts, and artwork.
- D. “Mark” means the literal component GRANNY THE LABEL in any stylization or format, whether alone or as part of a composite mark.
- E. “Opposer” means National Academy of Recording Arts & Sciences, Inc.

- F. “Person” means any natural person, business, legal entity, governmental entity, or association.
- G. “You” or “Your” means Granny the Label LLC and any Person acting on its behalf.
- H. If You contend that You are entitled to withhold from production the whole or any part of any responsive Documents on the basis of the attorney-client privilege, the work-product doctrine, or other grounds, for each such Document: (a) state the nature of the document; (b) state the date of the document; (c) identify the sender, author, and all recipients of the document; (d) summarize the subject matter of the document; and (e) state the basis on which you contend you are entitled to withhold the document from production.
- I. If You object to a document request, You must produce all Documents covered by the request that are not covered by the objection. Similarly, if You object to producing any portion of a Document, You must produce all portions of the Document that are not covered by the objection.

### **REQUESTS FOR PRODUCTION**

- 1. All non-privileged Documents dated on or before September 13, 2023 (the date Opposer filed an extension of time to oppose the application) referring or relating to Opposer or the GRAMMY® brand.
- 2. Documentary evidence sufficient to identify Your owners. (ATTACHED)
- 3. Documentary evidence sufficient to identify Your managers. (ATTACHED)
- 4. Documentary evidence sufficient to identify Your members. (ATTACHED)
- 5. A specimen of the use of the Mark on or in connection with any of the Class 9 Goods. (ATTACHED)
- 6. All non-privileged Documents related to the selection of the Mark, including brainstorming notes, emails, presentations, and internal communications. (DECLINE)
- 7. Any research, including trademark research reports, conducted regarding the Mark. (DECLINE)
- 8. Documentary evidence sufficient to verify Your internal and external written instructions regarding the creation of any stylized mark incorporating the component GRANNY (i.e., with or without the additional components “THE LABEL”). (DECLINE)
- 9. Documentary evidence sufficient to verify Your first use in commerce of the Mark on or in connection with any good or service. (ATTACHED)
- 10. Documentary evidence sufficient to verify Your first use in commerce of the Mark on or in connection with any of the Class 9 Goods. (ATTACHED)

11. Documentary evidence sufficient to verify each type of Branded Goods You are currently offering (ATTACHED)

12. Documentary evidence sufficient to verify each type of Branded Goods You are currently offering

(ATTACHED)

13. Documentary evidence sufficient to verify each type of Branded Goods You have a *bona intent* to offer but have not offered yet. (Podcast, manufacture vinyl, cassettes and cd's)
14. Documentary evidence sufficient to verify Your U.S. sales figures (by volume and dollar value) for Branded Goods, if any. (DECLINE)
15. Documentary evidence sufficient to verify Your U.S. advertising expenditures for Branded Goods. (DECLINE)
16. Documentary evidence sufficient to verify Your U.S. promotional expenditures other than advertising for Branded Goods. (DECLINE)
17. Representative samples of each type (*e.g.*, print, online, etc.) of advertisement for the Branded Goods You have displayed or distributed. (DECLINE)
18. Representative samples of press releases discussing You or the Branded Goods. (DECLINE)
19. Representative samples (at least ten) of solicitations You have sent to a third party requesting that the third party sell, stream, or perform Your sound recordings. (DECLINE)
20. Representative samples (at least five) of solicitations You have sent to musical artists requesting that they become a musical artist on Your music label. (DECLINE)
21. Documents related to Your registration with any online music platform for the purpose of distributing Your Branded Goods. (DECLINE)
22. Any submissions of Your music label's sound recordings for awards consideration. (NO)
23. All plans and strategies You have created (including goals, marketing plans, promotional plans, sales plans, target markets, and positioning) relating to Your Branded Goods. (DECLINE)
24. All internal and external communications relating to positioning Your music label within the music industry. (DECLINE)
25. Presentations You have prepared for any Person (including media outlets, potential investors, funding sources, endorsers, distributors, retailers, employees, customers, potential customers, or partners), whether presented or not, relating to the Branded Goods. (DECLINE)
26. Agreements (including, but not limited to, assignment agreements, license agreements, settlement agreements, coexistence agreements, sponsorship agreements, and consent agreements) referencing the Mark. (DECLINE)
27. Agreements between You and the owner of the GRANNY SMALLS mark (if not You). (NO AGREEMENTS- We are the founders)

28. Documentary evidence sufficient to verify each instance in which You attempted to enforce intellectual property rights in the Mark and the outcome of Your efforts. (never had the encounter of someone infringing)
29. All non-privileged internal correspondence referencing, in any manner, Opposer or Opposer's GRAMMY® mark. (DECLINE)
30. Documentary evidence sufficient to identify any instance of consumer confusion between You and Opposer or its GRAMMY® mark. (NEVER)

# Exhibit 8

## Feldman, Joel (Shld-Atl-IP-Tech)

---

**From:** Rich Sulaka <rich@sulakalaw.com>  
**Sent:** Monday, January 6, 2025 12:00 PM  
**To:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech); AtlTrademark; markhickspromo@gmail.com  
**Subject:** Re: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715  
**Attachments:** Production files 91288715 Granny the Label PRODUCTION ANSWERS AND (ATTACHED SPECIMENS\_PROOF).zip

Joel,

I wanted to follow-up on our conversation from last week.

I was able to get the following information from my client Friday evening, but upon review, I believe that the responses require amendment and supplementation.

Please, bear with me, as I attempt to make certain that all requested information received an appropriate response/production.

Warm Regards,

Rich Sulaka

---

**From:** Joel.Feldman@gtlaw.com <Joel.Feldman@gtlaw.com>  
**Sent:** Monday, December 30, 2024 1:16 PM  
**To:** Rich Sulaka <rich@sulakalaw.com>  
**Cc:** holta@gtlaw.com <holta@gtlaw.com>; trademarkatl@gtlaw.com <trademarkatl@gtlaw.com>; markhickspromo@gmail.com <markhickspromo@gmail.com>  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

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**Cc:** [holta@gtlaw.com](mailto:holta@gtlaw.com) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; [trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com) <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
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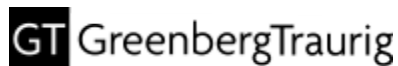
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As of today, Applicant's (i) initial disclosures, (ii) written responses to Opposer's First Requests for Production of Documents, and (iii) document production are all long overdue. Please promptly respond to this email to let me know when you will be serving (i), (ii), and (iii).

Sincerely,  
Joel Feldman

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group

Greenberg Traurig, LLP  
Terminus 200 | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
T +1 678.553.4778 | F +1 678.553.4779  
[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



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If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at [postmaster@gtlaw.com](mailto:postmaster@gtlaw.com), and do not use or disseminate the information.

# Exhibit 9

## Feldman, Joel (Shld-Atl-IP-Tech)

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Thursday, February 13, 2025 1:27 PM  
**To:** Rich Sulaka  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech); AtlTrademark; markhickspromo@gmail.com  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

**Importance:** High

Dear Rich,

Please let me know when the supplemental responses and document production will be delivered. I was anticipating receiving these materials far sooner than five weeks after your last email.

I assume Mr. Hicks will be applicant's 30(b)(6) deponent, but **please confirm**. If my assumption is correct, please let me know Mr. Hicks' availability for an in-person deposition the week of March 3rd.

Sincerely,  
Joel

**Joel R. Feldman**  
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T +1 678.553.4778

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**From:** Rich Sulaka <rich@sulakalaw.com>  
**Sent:** Tuesday, January 7, 2025 10:27 AM  
**To:** Feldman, Joel (Shld-Atl-IP-Tech) <Joel.Feldman@gtlaw.com>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <holta@gtlaw.com>; AtlTrademark <trademarkatl@gtlaw.com>; markhickspromo@gmail.com  
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I will be looking to address those responses in the supplemental disclosure.

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**From:** [Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>  
**Sent:** Monday, January 6, 2025 7:37 PM  
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**Cc:** [holta@gtlaw.com](mailto:holta@gtlaw.com) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; [trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com) <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>; [markhickspromo@gmail.com](mailto:markhickspromo@gmail.com) <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
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**Sent:** Monday, January 6, 2025 12:00 PM  
**To:** Feldman, Joel (Shld-Atl-IP-Tech) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; AtITrademark <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>; [markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)  
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Joel,

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Please, bear with me, as I attempt to make certain that all requested information received an appropriate response/production.

Warm Regards,

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**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

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Shareholder; Co-Chair, Trademark & Brand Management Group  
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**Sent:** Monday, December 30, 2024 9:56 AM  
**To:** Feldman, Joel (Shld-Atl-IP-Tech) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>; [markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; AtlTrademark <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** Re: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

**\*EXTERNAL TO GT\***

Following-up on your request.

Please, let me know if you have any availability this week.

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Rich Sulaka

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**Sent:** Friday, December 27, 2024 5:26 PM  
**To:** [Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>; [markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)  
<[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
**Cc:** [holta@gtlaw.com](mailto:holta@gtlaw.com) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; [trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com) <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** Re: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

Mr. Feldman,

I'm not sure where the miscommunication has arisen because I understood that my office had responded on behalf of my client to each of your requests. In any event, I'm available on the following dates and times next week in order to expeditiously address any outstanding concerns:

Monday, December 30, 2024 at 1 pm EST  
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Friday, January 3, 20245 at 11 am EST

Please, let me know if any of those dates/times work for you.

Warm Regards,

Rich Sulaka

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**From:** [Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>  
**Sent:** Thursday, December 26, 2024 2:36 PM  
**To:** Rich Sulaka <[rich@sulakalaw.com](mailto:rich@sulakalaw.com)>; [markhickspromo@gmail.com](mailto:markhickspromo@gmail.com) <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
**Cc:** [holta@gtlaw.com](mailto:holta@gtlaw.com) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; [trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com) <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

Dear Mr. Sulaka,

This is my third good-faith effort, by correspondence, to resolve Applicant's discovery delinquencies. If you do not respond with your availability for a telephone conference next week, I will have no choice but to file a motion to compel with the Board. **Please provide three times you are available next week to discuss three outstanding and long-overdue discovery obligations of Applicant:**

- (i) Initial disclosures;
- (ii) Written responses to Opposer's First Requests for Production of Documents; and
- (iii) Applicant's document production.

Sincerely,  
Joel Feldman

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group  
T +1 678.553.4778

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**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Monday, November 25, 2024 12:44 PM  
**To:** [rps@sulakalaw.com](mailto:rps@sulakalaw.com); Mark <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; AtITrademark <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

Dear Mr. Sulaka,

I am writing to follow up on my email below.

There are still three outstanding and long-overdue discovery obligations of Applicant:

- (i) Initial disclosures;
- (ii) Written responses to Opposer's First Requests for Production of Documents; and
- (iii) Applicant's document production.

Please provide me two times on Wednesday, November 27th and/or Monday, December 2nd when you are available to meet and confer regarding Applicant's discovery delinquencies.

Sincerely,  
Joel Feldman

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group  
T +1 678.553.4778

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**From:** Feldman, Joel (Shld-Atl-IP-Tech) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>  
**Sent:** Tuesday, November 5, 2024 12:06 PM  
**To:** [rps@sulakalaw.com](mailto:rps@sulakalaw.com); Mark <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; AtITrademark <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

Dear Mr. Sulaka,

I am writing regarding applicant's discovery response obligations in the above-referenced opposition proceeding.

On August 30, 2024, I served (1) Opposer's First Set of Interrogatories and (2) Opposer's First Requests for Production of Documents. The deadline to respond to this written discovery was September 30, 2024.

On September 30, 2024, Mr. Dempsey filed and served an unconsented motion to extend the deadline for applicant to respond to the written discovery by 30 days. As set forth in the Board's October 22, 2024 order, this motion was ultimately given no consideration because you did not refile it.

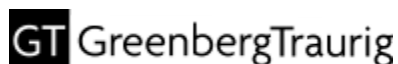
On November 4, 2024, you filed (but did not serve) written responses to Opposer's First Set of Interrogatories.

As of today, Applicant's (i) initial disclosures, (ii) written responses to Opposer's First Requests for Production of Documents, and (iii) document production are all long overdue. Please promptly respond to this email to let me know when you will be serving (i), (ii), and (iii).

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**Joel R. Feldman**  
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[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



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If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at [postmaster@gtlaw.com](mailto:postmaster@gtlaw.com), and do not use or disseminate the information.

# Exhibit 10

## Feldman, Joel (Shld-Atl-IP-Tech)

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Thursday, February 20, 2025 7:03 PM  
**To:** Rich Sulaka  
**Cc:** Holt, Alexandra (OfCnl-ATL-Ent-IP-Tech); AtlTrademark; markhickspromo@gmail.com  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715  
**Attachments:** 91288715 - 30b6 deposition notice.pdf

Dear Rich,

It has been a week since my below email and six weeks since you promised supplementation of your client's deficient RFP responses and document production.

As you know, the Board disfavors having to adjudicate motions to compel. My emails are a good-faith effort to resolve the need for the Board to intervene and compel applicant's RFP responses and document production. Please provide an update on when the supplemental responses and document production will be delivered. If you do not respond to my emails and/or applicant's supplemental RFP responses and document production are not delivered by March 3, 2025, then I will have no choice but to ask the Board to intervene.

Having not received a response to my request for Mr. Hicks' availability for an in-person deposition the week of March 3rd and having still not received applicant's RFP responses and document production, I have taken the liberty of scheduling applicant's 30(b)(6) deposition for **March 20, 2025**. I have attached a service copy of the notice of deposition.

Sincerely,  
Joel

**Joel R. Feldman**  
Shareholder; Co-Chair, Trademark & Brand Management Group  
T +1 678.553.4778

---

**From:** Feldman, Joel (Shld-Atl-IP-Tech)  
**Sent:** Thursday, February 13, 2025 1:27 PM  
**To:** Rich Sulaka <rich@sulakalaw.com>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <holta@gtlaw.com>; AtlTrademark <trademarkatl@gtlaw.com>; markhickspromo@gmail.com  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715  
**Importance:** High

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I will be looking to address those responses in the supplemental disclosure.

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**Cc:** [holta@gtlaw.com](mailto:holta@gtlaw.com) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; [trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com) <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
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**Cc:** [holta@gtlaw.com](mailto:holta@gtlaw.com) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; [trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com) <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

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Sincerely,  
Joel Feldman

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**Sent:** Monday, November 25, 2024 12:44 PM  
**To:** [rps@sulakalaw.com](mailto:rps@sulakalaw.com); Mark <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; AtITrademark <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** RE: National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

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Sincerely,  
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T +1 678.553.4778

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**From:** Feldman, Joel (Shld-Atl-IP-Tech) <[Joel.Feldman@gtlaw.com](mailto:Joel.Feldman@gtlaw.com)>  
**Sent:** Tuesday, November 5, 2024 12:06 PM  
**To:** [rps@sulakalaw.com](mailto:rps@sulakalaw.com); Mark <[markhickspromo@gmail.com](mailto:markhickspromo@gmail.com)>  
**Cc:** Holt, Alexandra (Assoc-ATL-Ent-IP-Tech) <[holta@gtlaw.com](mailto:holta@gtlaw.com)>; AtITrademark <[trademarkatl@gtlaw.com](mailto:trademarkatl@gtlaw.com)>  
**Subject:** National Academy of Recording Arts & Sciences, Inc. v. Granny The Label LLC, TTAB Opposition No. 91288715

Dear Mr. Sulaka,

I am writing regarding applicant's discovery response obligations in the above-referenced opposition proceeding.

On August 30, 2024, I served (1) Opposer's First Set of Interrogatories and (2) Opposer's First Requests for Production of Documents. The deadline to respond to this written discovery was September 30, 2024.

On September 30, 2024, Mr. Dempsey filed and served an unconsented motion to extend the deadline for applicant to respond to the written discovery by 30 days. As set forth in the Board's October 22, 2024 order, this motion was ultimately given no consideration because you did not refile it.

On November 4, 2024, you filed (but did not serve) written responses to Opposer's First Set of Interrogatories.

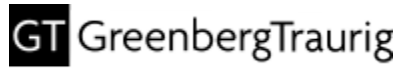
As of today, Applicant's (i) initial disclosures, (ii) written responses to Opposer's First Requests for Production of Documents, and (iii) document production are all long overdue. Please promptly respond to this email to let me know when you will be serving (i), (ii), and (iii).

Sincerely,  
Joel Feldman

**Joel R. Feldman**

Shareholder; Co-Chair, Trademark & Brand Management Group

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