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

Proceeding no.	91291640
Party	Plaintiff Agrotequilera de Jalisco, S.A. DE C.V.
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Signature	/Jessica Ogden/
Date	05/06/2025
Attachments	Ogden Declaration ISO Motion For Sanctions_VOLCANO VODKA.pdf(16519 bytes)

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

AGROTEQUILERA DE JALISCO, S.A. DE C.V., Opposer, -against- VALHALLA SPIRITS, LLC, Applicant.	**Opposition No. 91291640**

DECLARATION OF JESSICA OGDEN IN SUPPORT OF OPPOSER'S MOTION FOR SANCTIONS

I, Jessica Ogden, hereby declare under penalty of perjury:

1. I am an associate at Fross Zelnick Lehrman & Zissu, P.C. ("Fross Zelnick"), attorneys for Opposer Agrotequilera de Jalisco, S.A. de C.V. ("Opposer") and am staffed on the above-captioned matter. I submit this declaration in support of Opposer's motion for sanctions against Applicant Valhalla Spirits, LLC ("Applicant") in the nature of entry of judgment sustaining the above-captioned opposition proceeding and refusing registration of U.S. Trademark Application No. 97728560 ("Motion for Sanctions"). I make this declaration based on my personal knowledge of the facts and circumstances set forth herein, my review of my firm's records of this matter, and on the records of the Trademark Trial and Appeal Board (the "Board"), and the U.S. Patent and Trademark Office.

2. On January 27, 2025, Opposer filed a motion (1) compelling Applicant to produce all responsive documents within ten days of the Board's order on the motion and (2) resetting the

end of the discovery period to a date sixty days after the date set by the Board for Applicant to produce documents (the "Motion to Compel") (9 TTABVUE).

3. Applicant did not file any response to the Motion to Compel.

4. On February 28, 2025, the Board granted Opposer's Motion to Compel as conceded (the "February 28 Order"), requiring Applicant to, within ten days, serve "responses to Opposer's First Set of Requests for the Production of Documents and Things Nos. 1-3, 5-15, 17, 19-20, and 22-27." (12 TTABVUE 1–2.)

5. As of the date of filing of Opposer's Motion for Sanctions, Applicant has not produced any documents in this proceeding.

6. Applicant has not contacted Opposer since the February 28 Order.

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

Executed this 6th day of May 2025 at New York, New York.

/Jessica Ogden/
Jessica Ogden

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2025, a copy of the foregoing was sent by email to Applicant at greg.meffert@gmail.com, gwheinz@gwhventures.com, and gary@valhalla-spirits.com.

/Jessica Ogden/
Jessica Ogden