

ESTTA Tracking number: **ESTTA352530**

Filing date: **06/13/2010**

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

Proceeding	92050860
Party	Defendant American Strongman Corporation
Correspondence Address	Sepehr Daghighian Law Offices of Sepehr Daghighian, PC 433 North Camden Drive, 4th FL Beverly Hills, CA 90210 UNITED STATES sepehr@daghighian.com
Submission	Other Motions/Papers
Filer's Name	Sepehr Daghighian
Filer's e-mail	sepehr@daghighian.com
Signature	/Sepehr Daghighian/
Date	06/13/2010
Attachments	American Strongman - Respondents Pretrial Disclosures.pdf (4 pages)(34089 bytes)

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

TRANS WORLD INTERNATIONS, INC.)	
)	Opposition No.: 92/050860
)	
Petitioner,)	
v.)	
)	
AMERICAN STRONGMAN)	
CORPORATION)	
)	
Registrant.)	

Registrant's Pretrial Disclosures
Pursuant to Fed. R. Civ. Proc. 26(a)(3)

Registrant, AMERICAN STRONGMAN CORPORATION., hereby provides its Pretrial Disclosures, pursuant to Fed. R. Civ. Proc. 26(a)(3).

WITNESSES

Registrant, pursuant to Fed. R. Civ. Proc. 26(a)(3)(A)(i) and 26(a)(3)(A)(i), hereby submits the following names of witnesses that shall testify on its behalf at the subject trial and the names of witnesses that shall testify on its behalf by deposition:

Dione Wessels
American Strongman Corporation
11676 Mark Twain Lane
Bridgeton, MO 63044
(314) 565-5970

Mike Johnston
American Strongman Corporation
11676 Mark Twain Lane
Bridgeton, MO 63044
(314) 565-5970

EVIDENCE

Registrant, pursuant to Fed. R. Civ. Proc. 26(a)(2)(A)(iii), hereby submits the information concerning the evidence, which it intends to introduce at trial:

- Inventory and accounting summaries concerning the sale of goods/services by Registrant, which use the subject mark;
- Advertizing proofs concerning the sale of goods/services by Registrant, which use the subject mark;
- Internet printouts concerning the sale of goods/services by Registrant, which use the subject mark;
- Pictures of competitions and competitors concerning the sale of goods/services by Registrant, which use the subject mark;
- Third-party media articles concerning the sale of goods/services by Registrant, which use the subject mark;
- United States Trademark Registration for the subject mark;
- United States Trademark Application file for the subject mark;
- Contracts related to the sale of goods/services by Registrant, which use the subject mark;
- Correspondence related to the sale of goods/services by Registrant, which use the subject mark;
- Evidence of advertizing expenditures related to the sale of goods/services by Registrant, which use the subject mark;

- Internet postings and website printouts related to the sale of goods/services by Registrant, which use the subject mark;
- Promotional concerning the sale of goods/services by Registrant, which use the subject mark;
- Brochures concerning the sale of goods/services by Registrant, which use the subject mark;

Pursuant to the Federal Rules of Civil Procedure, Registrant reserves the right to amend, supplement, and modify this list prior to and during the course of trial.

Respectfully Submitted,
LAW OFFICES OF SEPEHR DAGHIGHIAN, P.C.

/Sepehr Daghighian/

Sepehr Daghighian, Esq.
June 13, 2010
Attorney for Registrant
Sepehr Daghighian, Esq.
433 North Camden Drive, Fourth Floor
Beverly Hills, California 90210
T: (310) 887-1333
F: (310) 887-1334

CERTIFICATE OF SERVICE

I am a Member of the Bar of California, not a Party in the Action, and I hereby certify that I caused to be served on Attorneys for Opposer a true and correct copy of each of the foregoing documents:

Registrant's Pretrial Disclosures Pursuant to Fed. R. Civ. Proc. 26(a)(3)

was served on June 13, 2010 by first class U.S. Mail to:

Stephen A. Hill
RANKIN, HILL, & CLARK, LLP
38210 Glenn Avenue
Willoughby, Ohio 44094

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

Executed on June 13, 2010 at Beverly Hills, California.

/Sepehr Daghighian/

Sepehr Daghighian, Esq.