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

Proceeding	92055630
Party	Plaintiff U.S.A. Famous Original Ray's Licensing Corp.
Correspondence Address	JOHN C SULLIVAN RUSKIN MOSCOU FALTISCHEK 1425 RXR PLAZA, EAST TOWER 15TH FLOOR UNIONDALE, NY 11556 UNITED STATES jsullivan@rmfpc.com
Submission	Motion for Sanctions
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Signature	/Jonathan C. Sullivan/
Date	05/07/2013
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

-----X
U.S.A. FAMOUS ORIGINAL RAY'S LICENSING
CORP.,

Petitioner,

-against-

PAPA RAY'S PIZZA 1, INC.,

Registrant.

Cancellation No.: 92055630

Marks: **PAPA RAY'S PIZZA &
WINGS; PAPA RAY'S PIZZA
& WINGS YOUR
NEIGHBORHOOD PLACE**

Reg. Nos. 4001654 and 4001655

Reg. Date: July 26, 2011

-----X
**PETITIONER'S MOTION FOR THE SANCTION OF JUDGMENT IN
ITS FAVOR BASED ON REGISTRANT'S FAILURE TO PROVIDE DISCOVERY AND
REFUSAL TO PARTICIPATE IN THESE PROCEEDINGS**

Petitioner moves the Board for the sanction of judgment in its favor based on Registrant's failure to provide responses to Petitioner's outstanding discovery requests and Registrant's affirmative representation that it will not be taking any further action in defense of this cancellation proceeding.

Petitioner served its First Set of Requests for Production of Documents and Things and First Set of Interrogatories (collectively, "Discovery Demands") on Registrant on February 7, 2013. A copy of Petitioner's Discovery Demands along with Certificates of Service are annexed as Exhibit 1.

Registrant was required to respond to Petitioner's Discovery Demands on or before March 11, 2013. Registrant failed to respond to Petitioner's Discovery Demands or offer any reason or explanation for its failure to respond by the March 11, 2013 deadline and still has not responded.

Petitioner's attorney contacted Registrant's attorney, Justin Lampel, Esq., to inquire as to whether Registrant would provide responses to Petitioner's outstanding Discovery Demands. Registrant's attorney informed us that Registrant would not be providing responses to Petitioner's Discovery Demands and Registrant will not be taking any further action to defend this cancellation proceeding.

In light of Registrant's response, we requested that Registrant voluntarily cancel its registrations to avoid the necessity of filing a motion. Registrant's attorney again indicated that his client does not intend to take any further action with respect to this cancellation proceeding including executing a voluntary stipulation of cancellation.

Trademark Rule 2.120(g)(2) provides:

[If a party] fails to provide any response to a set of interrogatories or to a set of requests for production of documents and things, and such party or the party's attorney or other authorized representative informs the party seeking discovery that no response will be made thereto, the Board may make any appropriate order, as specified in paragraph (g)(1) of this section.

Section 2.120(g)(1) permits the Board to impose the sanctions provided under Fed. R. Civ. Pro. 37(b)(2) which include striking pleadings in whole or in part, dismissing the action or proceeding in whole or in part, or rendering a default judgment against the disobedient party.

Petitioner therefore requests that the Board issue a default judgment in its favor based upon Registrant's failure and refusal to provide responses to Petitioner's Discovery Demands and affirmative statement that it will not be providing any such responses in the future.

Petitioner also requests that the Board issue a default judgment in its favor based on Registrants' affirmative statements that it will not be taking any further action to defend this cancellation proceeding,

Petitioner therefore requests that the Board issue a default judgment in its favor (i) striking Registrant's Answer; (ii) cancelling Reg. Nos. 4001654 and 4001654 with prejudice; and (iii) awarding such other and further relief as the Board finds is just and equitable. Petitioner further seeks a suspension of this proceeding pending a resolution of this motion and that the deadlines in this proceeding be extend and reset in the event that its motion is denied.

WHEREFORE, Petitioner requests judgment in its favor:

- (i) striking Registrant's Answer;
- (ii) cancelling Reg. Nos. 4001654 and 4001654 with prejudice;
- (iii) suspending this proceeding pending a resolution of this motion and extending and resetting the deadlines in this proceeding in the event that its motion is denied; and
- (iv) awarding such other and further relief as the Board finds is just and equitable;

Dated: Uniondale, New York
May 7, 2013

RUSKIN MOSCOU FALTISCHEK, P.C.

By: 

John A. DeMaro, Esq.
Jonathan C. Sullivan, Esq.
Attorney for Petitioner
1425 RXR Plaza
Uniondale, New York 11556
(516) 663-6600

To: Justin Lampel, Esq.
LAMPEL & ASSOCIATES, PC
Attorney for Registrant
555 Skokie Blvd., Suite 500
Northbrook, IL 60062
(847) 845-4345

George S. Bellas, Esq.
Bellas & Wachowski
Co-counsel for Registrant
15 North Northwest Highway
Park Ridge, Illinois 60068
(847) 823-9030 ext. 219

EXHIBIT 1

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

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U.S.A. FAMOUS ORIGINAL RAY'S LICENSING
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Marks: **PAPA RAY'S PIZZA &
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NEIGHBORHOOD PLACE**

-against-

PAPA RAY'S PIZZA 1, INC.,

Reg. Nos. 4001654 and 4001655

Registrant.

Reg. Date: July 26, 2011

-----X

**PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS AND THINGS**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Petitioner, U.S.A. Famous Original Ray's Licensing Corp., hereby serves Petitioner's First Set of Requests for Production of Documents and Things to be answered by Registrant, Papa Ray's Pizza 1, Inc., within the time provided by the Federal Rules of Civil Procedure and the Trademark Rules of Practice.

DEFINITIONS AND INSTRUCTIONS

For purposes of these Requests for Production of Documents and Things (the "Requests"), the following definitions and instructions shall apply:

1. "Petitioner" means the Petitioner, U.S.A. Famous Original Ray's Licensing Corp., its predecessors in interest, its successors in interests, and its directors, employees, agents, representatives, franchisees, licensees and all other Persons acting or purporting to act on its behalf, as the context hereof may require.
2. "Registrant" means the Registrant, Papa Ray's Pizza 1, Inc., its predecessors in interest, its successors in interest, and its directors, employees, agents, representatives,

franchisees, licensees, and all other Persons acting or purporting to act on its behalf, as the context hereof may require.

3. "Person" means any individual, sole proprietorship, partnership, firm, corporation, joint venture, association, or other entity.

4. "Document" means any medium in the possession, custody, or control of Registrant upon which intelligence or information is recorded or from which intelligence or information can be obtained, including by way of illustration, but not by way of limitation, the following items: Letters; emails; reports; communications including internal company communications; preliminary notes and drafts; telegrams; telexes; faxes, memoranda; summaries of records of telephone conversations; routing (or buck) slips; magnetic media from which audible or visual information can be obtained, such as tapes, discs, or the like; diaries; graphs; notebooks; charts; plans; artists' drawings; positive or negative prints or photographic pictures, motion or still, including excised frames of motion pictures; minutes of records of conferences and meetings, including meetings of directors, executive committees and financial committees; lists of Persons attending meetings or conferences; expressions or statements of policy; reports or summaries of investigations, opinions, or reports of consultants; non-privileged communications with attorneys; records of summaries of negotiations; contracts and agreements; brochures; pamphlets; advertisements; circulars; trade letters; press releases; drafts of any documents; and revisions of drafts of any documents.

5. "Thing" means any physical object other than a Document.

6. "Trademark" means trademark or service mark.

7. "Petitioner's Marks" means the following marks:

(a) RAY'S PIZZA (U.S. Registration No. 2196832)

- (b) FAMOUS RAY'S PIZZA (U.S. Registration No. 2196830)
- (c) FAMOUS ORIGINAL RAY'S PIZZA (U.S. Registration No. 1918484)
- (d) FAMOUS ORIGINAL RAY'S PIZZA EST. 1964 (logo) (U.S. Registration No. 1918483)
- (e) RAY'S FAMOUS ORIGINAL RAY'S PIZZA (U.S. Registration No. 3675202).

8. "Registrant's Marks" means the following marks:

- (a) Papa Ray's Pizza & Wings (U.S. Registration No. 4001654)
- (b) Papa Ray's Pizza & Wings Your Neighborhood Place (U.S. Registration No. 4001655).

9. These Requests shall be deemed continuous and Registrant shall be obligated to change, supplement and amend its answers hereto, if and when filed, as prescribed by Rule 26(e) of the Federal Rules of Civil Procedure.

10. If Registrant objects to the production of any documents, which fall within a request based on a claim of privilege or a claim that such documents constitute attorney work product, the following information is requested:

- (a) The date of the document;
- (b) The name of the document's originator, the name of the person to whom it is addressed and the names of all persons who were shown copies;
- (c) A general description of the type of document and the subject matter to which it pertains; and
- (d) The basis for withholding the document.

DOCUMENTS AND THINGS TO BE PRODUCED

1. All Documents and Things relating to Registrant's creation, consideration, design, development, selection, adoption, availability and registration or attempts to register Registrant's Marks.

2. All Documents and Things relating to any market studies, surveys, focus groups, or other studies, which relate to the use or advice against use of Registrant's Marks.

3. All Documents and Things including those filed with the United States Patent and Trademark Office relating to Registrant's decision to offer goods or services for sale under Registrant's Marks.

4. All Documents and Things which disclose the length of time during which Registrant has offered goods or services for sale under Registrant's Marks.

5. All Documents and Things referring or relating to Registrant's decision to file federal trademark applications for Registrant's Marks.

6. All Documents and Things referring or relating to the investigation undertaken by Registrant regarding Petitioner and Petitioner's Marks before filing the federal trademark applications for Registrant's Marks.

7. All Documents and Things referring or relating to the complete factual basis Registrant has to deny the allegations made by Petitioner in paragraphs 16, 18, 19, 20, 21, 22, 23, 24, and 25 of Petitioner's Petition for Cancellation.

8. All Documents and Things referring or relating to the complete factual basis Registrant has to assert the Affirmative Defenses set forth in Registrant's Answer to Petitioner's Petition for Cancellation.

9. Each different advertisement, press release, catalog, brochure, point-of-purchase material, web page, training manual or other advertising means or media in which Registrant's Marks have been used, are used or will be used by Registrant.

10. All correspondence with any advertising or sales agent relating in any way to Registrant's Marks.

11. All Documents and Things evidencing Registrant's current or planned use of Registrant's Marks.

12. All Documents and Things which relate to the circumstances under which Registrant first became aware of Petitioner's use of Petitioner's Marks.

13. All communications between Registrant and other persons which refer to Petitioner's Marks or the goods and services offered by Petitioner.

14. Each and every search conducted by or on behalf of Registrant regarding the use or registration of Registrant's Marks.

15. All Documents prepared or considered by any experts employed by Registrant in connection with his or her formation of an opinion concerning the subject matter of this cancellation proceeding.

16. All Documents and Things which Registrant believes provide any support for each of Registrant's answers to Petitioner's accompanying first Set of Interrogatories.

17. All Documents and Things related to any litigation, oppositions, cancellations or other similar trademark proceedings in which Applicant has been involved in as a party or witness.

18. All Documents and Things which Registrant intends to rely on at the trial in this proceeding.

Dated: Uniondale, New York
February 7, 2013

RUSKIN MOSCOU FALTISCHEK, P.C.

By: 

John A. DeMaro, Esq.
Jonathan C. Sullivan, Esq.
Attorney for Petitioner
1425 RXR Plaza
Uniondale, New York 11556
(516) 663-6600

To: Justin Lampel, Esq.
LAMPEL & ASSOCIATES, PC
Attorney for Registrant
555 Skokie Blvd., Suite 500
Northbrook, IL 60062
(847) 845-4345

George S. Bellas, Esq.
Bellas & Wachowski
Co-counsel for Registrant
15 North Northwest Highway
Park Ridge, Illinois 60068
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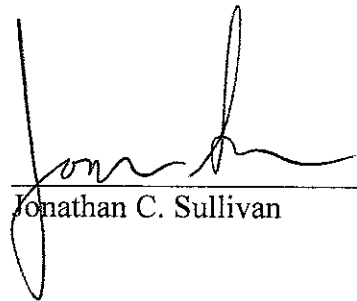
CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of Petitioner's Rule 26(a)(1) Disclosures, to be served by first class postage prepared mail by depositing the same with the U.S. Postal Service on this the 7th day of February, 2013 to Registrant's attorneys at the following addresses:

Justin Lampel, Esq.
Lampel & Associates
555 Skokie Blvd., Suite 500
Northbrook, IL 60062

George S. Bellas, Esq.
Bellas & Wachowski
15 North Northwest Highway
Park Ridge, Illinois 60068

Dated: February 7, 2013
Uniondale, New York


Jonathan C. Sullivan

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

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U.S.A. FAMOUS ORIGINAL RAY'S LICENSING
CORP.,

Cancellation No.: 92055630

Petitioner,

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-against-

PAPA RAY'S PIZZA 1, INC.,

Reg. Nos. 4001654 and 4001655

Registrant.

Reg. Date: July 26, 2011

----- X

PETITIONER'S FIRST SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Petitioner, U.S.A. Famous Original Ray's Licensing Corp., hereby serves Petitioner's First Set of Interrogatories to be answered by Registrant, Papa Ray's Pizza 1, Inc., under oath, said answers to be served upon Registrant within the time provided by the Federal Rules of Civil Procedure and the Trademark Rules of Practice.

DEFINITIONS AND INSTRUCTIONS

For purposes of these Interrogatories, the following definitions and instructions shall apply:

1. "Petitioner" means the Petitioner, U.S.A. Famous Original Ray's Licensing Corp., its predecessors in interest, its successors in interests, and its directors, employees, agents, representatives, franchisees, licensees and all other Persons acting or purporting to act on its behalf, as the context hereof may require.
2. "Registrant" means the Registrant, Papa Ray's Pizza 1, Inc., its predecessors in interest, its successors in interest, and its directors, employees, agents, representatives,

franchisees, licensees, and all other Persons acting or purporting to act on its behalf, as the context hereof may require.

3. "Person" means any individual, sole proprietorship, partnership, firm, corporation, joint venture, association, or other entity.

4. "Document" means any medium in the possession, custody, or control of Registrant upon which intelligence or information is recorded or from which intelligence or information can be obtained, including by way of illustration, but not by way of limitation, the following items: Letters; emails; reports; communications including internal company communications; preliminary notes and drafts; telegrams; telexes; faxes, memoranda; summaries of records of telephone conversations; routing (or buck) slips; magnetic media from which audible or visual information can be obtained, such as tapes, discs, or the like; diaries; graphs; notebooks; charts; plans; artists' drawings; positive or negative prints or photographic pictures, motion or still, including excised frames of motion pictures; minutes of records of conferences and meetings, including meetings of directors, executive committees and financial committees; lists of Persons attending meetings or conferences; expressions or statements of policy; reports or summaries of investigations, opinions, or reports of consultants; non-privileged communications with attorneys; records of summaries of negotiations; contracts and agreements; brochures; pamphlets; advertisements; circulars; trade letters; press releases; drafts of any documents; and revisions of drafts of any documents. For purposes of these interrogatories, "Document" shall also mean any of the foregoing not in Registrant's possession, custody or control, the existence of which is known to Registrant.

5. "Thing" means any physical object other than a Document.

6. "Trademark" means trademark or service mark.

7. "Petitioner's Marks" means the following marks:
- (a) RAY'S PIZZA (U.S. Registration No. 2196832)
 - (b) FAMOUS RAY'S PIZZA (U.S. Registration No. 2196830)
 - (c) FAMOUS ORIGINAL RAY'S PIZZA (U.S. Registration No. 1918484)
 - (d) FAMOUS ORIGINAL RAY'S PIZZA EST. 1964 (logo) (U.S. Registration No. 1918483)
 - (e) RAY'S FAMOUS ORIGINAL RAY'S PIZZA (U.S. Registration No. 3675202).

8. "Registrant's Marks" means the following marks:
- (a) Papa Ray's Pizza & Wings (U.S. Registration No. 4001654)
 - (b) Papa Ray's Pizza & Wings Your Neighborhood Place (U.S. Registration No. 4001655).

9. "Specify" means to provide full and detailed information.

10. Where identification of any Document is required by use of the word "Identify," such identification should be sufficient to support a request for the production of the Document under Rule 34 of the Federal Rules of Civil Procedure and the Trademark Rules of Practice, and should include by way of illustration but without limitation the following information, even if the Registrant intends to object to the production of said Document:

- (a) The type of Document, *i.e.*, whether it is a letter, memorandum, report, drawing, chart, etc.;
- (b) The general subject matter of the Document;
- (c) The name of the creator of the Document;
- (d) Any numerical designation appearing on the Document, such as a drawing

Number, sample number or file references; and

- (e) If the Document is not in Registrant's possession, custody, or control, the identity, as defined herein below, of the Person having possession, custody or control of said Document.

Registrant may, in lieu of identification, as the time Registrant serves his answers to these Interrogatories, mail to Petitioner the original of such Document, or a legible copy or photograph of such Document, suitably labeled and marked to show to which Interrogatory each Document is being produced in lieu of identification.

11. Where the identification of any person is required by use of the word "Identify," such identification should be sufficient to identify the person in a notice of taking the deposition of such person, and should include without limitation the following information:

- (a) full name;
- (b) business address;
- (c) job title;
- (d) employer or professional affiliations; and
- (e) home address.

12. Where the identification of an entity is required by use of the word "Identify," such identification should be sufficient to identify the entity, and should include without limitation the following information:

- (a) the full name or title;
- (b) principal place of business;
- (c) nature or type of entity;
- (d) the state of incorporation or registration; and

(e) the principal business conducted by such Person.

13. If Registrant is aware that a Document (or a group of Documents) once existed but has been destroyed, Registrant is requested to state when the Document (or group of Documents) was destroyed, who destroyed it, why it was destroyed, and the circumstances under which it was destroyed.

14. These Interrogatories shall be deemed continuous and Registrant shall be obligated to change, supplement and amend his answers hereto as prescribed by Rule 26(e) of the Federal Rules of Civil Procedure.

15. These Requests shall be deemed continuous and Registrant shall be obligated to change, supplement and amend its answers hereto, if and when filed, as prescribed by Rule 26(e) of the Federal Rules of Civil Procedure.

16. The words "and" and "or" shall be construed conjunctively or disjunctively as necessary to bring within the Interrogatories all information which might otherwise be construed as outside their scope.

17. If Registrant objects to any interrogatory or request for production of documents based on a claim of privilege or a claim that disclosure invades attorney work product, state the nature of the privilege claimed and for each communication, document, or tangible thing over which a privilege is claimed provide as much of the following information as is not encompassed by the privilege: its type, its general subject matter and purpose; its date; the names of persons making and receiving the communication, document, or tangible thing or a copy thereof, or if the communication was oral, of those present when it was made; their relationship to the author or speaker; and any other information upon which you may rely to support your claim of privilege or other immunity from discovery.

INTERROGATORIES

1. Identify each Person who conceived of Registrant's Mark, when Registrant's Mark was conceived, and all documents referring or relating to such conception.
2. Identify each Person having information relating to any formal or informal trademark searches or investigations which relate to the term Papa Ray's Pizza & Wings, whether used alone or in combination with other terms, and identify all documents relating to the searches or investigation.
3. Identify the Persons having the greatest knowledge about advertising, promotion and use or intended use of Registrant's Mark.
4. Identify and describe the way Registrant created or came up with the name Papa Ray's Pizza & Wings.
5. Specify the name and description of each type of good or service in connection with which Registrant has used or intends to use Registrant's Mark, and for each of the goods or services so identified, specify the first use date, or anticipated use date, of Registrant's Mark in connection with said good or services.
6. Specify whether Registrant intends to expand the goods offered under Registrant's Mark to other goods or services, other channels of trade, or other geographical territories, and identify all documents relating or referring to such expansion.
7. Specify the channels of trade currently used or intended to be used by Registrant for marketing, promoting and selling Registrant's goods or services on or in connection with Registrant's Mark; including identifying all representative outlets, such as agents, licensees, retailers, wholesalers, and local offices, for Registrant's goods and services.

8. Identify each person, agency or corporation that has participated or will participate in the creation, distribution, advertising and/or promotion of Registrant's Mark and goods and services, and state the duties and period of time during which each such person, agency or corporation has participated.

9. Describe the circumstances under which Registrant first became aware of Petitioner's use or registration of Petitioner's Marks, and identify all Persons involved.

10. Identify all instances in which any person has been or claimed to be confused, mistaken, or deceived as to the relationship between Registrant and any other entity, or as to the products of Registrant and any other entity, including, but not limited to, any misdirected communications and inquiries regarding a relationship between Registrant and Petitioner.

11. Identify any complaints that Registrant has received regarding Registrant's goods and services, including, but not limited to, complaints from consumers, agents, licensees, retailers and wholesalers, and for each complaint, specify the nature of the complaint and the person who lodged the complaint, and identify all documents referring or relating to the complaint.

12. Fully state the legal and factual basis for Registrant's denial that Registrant's use and continued registration of Registrant's Marks is likely to and will cause confusion in the marketplace among purchasers and potential purchasers due to the similarity between Petitioner's Marks and Registrant's Marks, and the closely related nature of the services and goods provided by the respective parties, causing damage to Petitioner, as stated in Paragraph 18 of Petitioner's Petition for Cancellation.

13. Fully state the legal and factual basis for Registrant's First Affirmative Defense alleging that Petitioner is not damaged by the registration of PAPA RAY'S PIZZA & WINGS

and PAPA RAY'S PIZZA & WINGS YOUR NEIGHBORHOOD PLACE (with design) and therefore lacks standing to petition to cancel the registration.

14. Fully state the legal and factual basis for Registrant's Second Affirmative Defense alleging that Petitioner lacks exclusive rights to the term RAY in association with restaurant services.

15. Fully state the legal and factual basis for Registrant's Third Affirmative Defense alleging that Petitioner is barred from seeking cancellation of Registrant's trademarks under the doctrines of laches, estoppel, waiver and/or unclean hands.

16. Fully state the legal and factual basis for Registrant's Fourth Affirmative Defense alleging that Petitioner has acquiesced in Registrant's adoption, registration and use of the marks that are the subject of this Petition for Cancellation.

17. Fully state the legal and factual basis for Registrant's Eleventh Affirmative Defense alleging that Petitioner's Notice of Cancellation fails to state a claim upon which relief can be granted.

18. Fully state the legal and factual basis for Registrant's Twelfth Affirmative Defense alleging that Registrant is the creator and senior use of the mark PAPA RAY'S.

Dated: Uniondale, New York
February 7, 2013

RUSKIN MOSCOU, FALTISCHEK, P.C.

By: 

John A. DeMaro, Esq.

Jonathan C. Sullivan, Esq.

Attorney for Petitioner

1425 RXR Plaza

Uniondale, New York 11556

(516) 663-6600

To: Justin Lampel, Esq.
LAMPEL & ASSOCIATES, PC
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Co-counsel for Registrant
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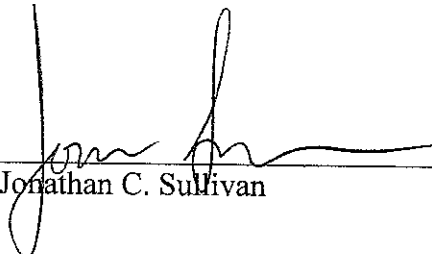
CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of Petitioner's Rule 26(a)(1) Disclosures, to be served by first class postage prepared mail by depositing the same with the U.S. Postal Service on this the 7th day of February, 2013 to Registrant's attorneys at the following addresses:

Justin Lampel, Esq.
Lampel & Associates
555 Skokie Blvd., Suite 500
Northbrook, IL 60062

George S. Bellas, Esq.
Bellas & Wachowski
15 North Northwest Highway
Park Ridge, Illinois 60068

Dated: February 7, 2013
Uniondale, New York


Jonathan C. Sullivan

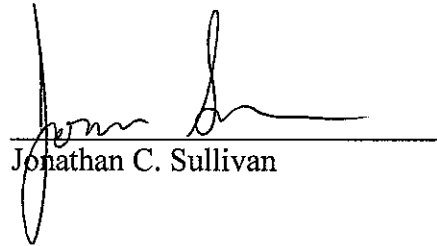
CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of PETITIONER'S MOTION FOR THE SANCTION OF JUDGMENT IN ITS FAVOR BASED ON REGISTRANT'S FAILURE TO PROVIDE DISCOVERY AND REFUSAL TO PARTICIPATE IN THESE PROCEEDINGS, to be served by first class postage prepared mail by depositing the same with the U.S. Postal Service on this the 7th day of May, 2013 to Registrant's attorneys at the following addresses:

Justin Lampel, Esq.
Lampel & Associates
555 Skokie Blvd., Suite 500
Northbrook, IL 60062

George S. Bellas, Esq.
Bellas & Wachowski
15 North Northwest Highway
Park Ridge, Illinois 60068

Dated: May 7, 2013
Uniondale, New York


Jonathan C. Sullivan