

ESTTA Tracking number: **ESTTA744823**

Filing date: **05/06/2016**

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

Proceeding	92059848
Party	Plaintiff Kinamed Navigation Systems, LLC
Correspondence Address	NICOLE TOWNES KNOBBE MARTENS OLSON & BEAR LLP 2040 MAIN STREET, 14TH FLOOR IRVINE, CA 92614 UNITED STATES efiling@Knobbe.com
Submission	Other Motions/Papers
Filer's Name	Nicole Townes
Filer's e-mail	efiling@knobbe.com
Signature	/Nicole Townes/
Date	05/06/2016
Attachments	Response to Board Order Dated April 6 2016 - KMED.003N.pdf(24611 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Kinamed Navigation Systems, LLC,)	U.S. Cancellation No.: 92059848
)	
Petitioner,)	Registration No.: 4,569,095
v.)	
)	Trademark: NAVIPRO
Boston Scientific Scimed, Inc.)	
)	
Respondent.)	
)	

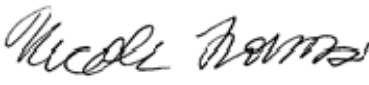
**PETITIONER’S RESPONSE TO BOARD’S REQUEST FOR STATUS OF TAKING ITS
EXPERT WITNESS**

Petitioner Kinamed Navigation Systems, LLC (“Kinamed”) is filing this response to comply with the Board’s Order dated April 6, 2016. Kinamed has timely disclosed and intends to rely upon expert witness Richard F. Santore. Respondent, Boston Scientific Scimed, Inc. took the deposition of Richard F. Santore on August 7, 2015. The taking of discovery related to Petitioner’s expert witness has been completed.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: May 6, 2016

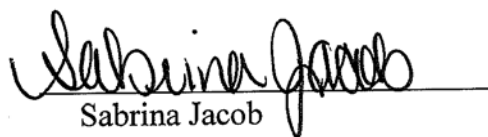
By: 

Jeffrey L. Van Hoosear
Nicole Rossi Townes
2040 Main Street, Fourteenth Floor
Irvine, CA 92614
(949) 760-0404
efiling@knobbe.com
Attorneys for Petitioner,
Kinamed Navigation Systems, LLC,

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing **PETITIONER'S RESPONSE TO BOARD'S REQUEST FOR STATUS OF TAKING ITS EXPERT WITNESS** has been served on Respondent's counsel on May 6, 2016 by electronic mail and by mailing one copy via the United States Mail, first-class postage prepaid to:

JAMES R STEFFEN
FAEGRE BAKER DANIELS LLP
2200 WELLS FARGO CENTER, 90 SOUTH SEVENTH STREET
MINNEAPOLIS, MN 55402
louis.perry@faegrebd.com
james.steffen@faegrebd.com


Sabrina Jacob

23266329