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

Proceeding	92061474
Party	Plaintiff Omaha Steaks International, Inc.
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Submission	Opposition/Response to Motion
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Date	10/12/2015
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Omaha Steaks International, Inc.
Plaintiff

v.

Greater Omaha Packing Co., Inc.
Defendant

Cancellation No. 92061474 (Parent)
Registration No. 4690144
Registration No. 4721723

PLAINTIFF'S RESPONSE TO MOTION TO COMPEL

COMES NOW Plaintiff, Omaha Steaks International, Inc. ("Omaha Steaks") and for its Response to Motion to Compel, responds as follows:

1. On September 15, 2015, Defendant Greater Omaha Packing Co., Inc. served its Motion to Compel responses to: August 5, 2015 First Interrogatories, First Request for Production of Documents, and First Request for Admissions.
2. In response, on this date, October 12, 2015, Plaintiff Omaha Steaks served its Responses to First Request for Production of Documents (without objections).
3. In further response, on the date, October 12, 2015, Plaintiff Omaha Steaks served its Responses to First Request for Admissions (without objections, but with clarifications in some responses, which clarifications are supported by the corresponding cited documents).
4. Plaintiff Omaha Steaks plans to serve Answers to First Interrogatories no later than Friday, October 16, 2015.

CONCLUSION

Omaha Steaks respectfully submits that Defendant's motion as to the First Request for Production of Documents and First Request for Admissions has been rendered moot by the Responses served today upon Counsel for Defendant and respectfully requests that an order be issued denying the instant Motion to Compel as those Requests, subject to Defendant's review and right to revisit the same should Defendant deem the Responses insufficient.

DATED this 12th day of October, 2015.

Respectfully submitted,

By: /Nora M. Kane/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on Defendant by sending the same this 12th day of October, 2015, via electronic mail to I. Stephen Samuels at ISS@SamuelsTM.com.

/Nora M. Kane/