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

Proceeding	92061571
Party	Defendant Ivo N Njabe
Correspondence Address	IVO N NJABE 3255 JUSTINA TERRACE, APT #7 JACKSONVILLE, FL 32277 UNITED STATES njabe2002@yahoo.ca
Submission	Other Motions/Papers
Filer's Name	Ivo Njabe
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Signature	/Ivo N. Njabe/
Date	08/31/2015
Attachments	Initial Disclosure.pdf(322764 bytes)

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

GESTION DIANE LANCTÔT LTÉE

Cancelation No. 92061571

v.

Registration No. 4299998

IVO N. NJABE

Mark: NIVO

Registrant, Ivo Njabe, doing business as NIVO, (hereafter "Registrant") hereby submits its initial disclosures as required by Rule 26(a) (1) of Federal Rules of Civil Procedure 37 C.F.R.

§2.120(a) (3).

- A. In accordance with Rule 26(a)(1)(A) (i), following is a list of persons who are likely to have discoverable non-privileged information that Registrant may use to support its claims and defenses, unless solely for impeachment:

Registrant, Ivo Njabe, NIVO, LLC, Jacksonville, FL. (Contact directly)

Subject: Use and ownership of Registrant's Mark; design, inspiration and creation for Registrant's Mark; Registrant's business operations and activities to prove it is active in the marketplace with no plans to abandon use of Mark; Registrant's goods; Registrant's trademark application; Registrant's business registration; Registrant's first used of Mark in commerce in the United States; facts and defenses alleged in the Notice of Cancelation and the Answer thereto.

Richard Nsungum, Jacksonville, FL. (Contact through Registrant)

Subject: Witness on initial business transactions for first use of Mark in the United States.

Applicant reserves the right to amend this list upon identification of other individuals through discovery or through development of the issues.

B. In accordance with Rule 26(a)(1)(A)(ii), a description by category of all documents and things now in the Registrant's possession, custody or control that it may use to support its claims or defenses, unless solely for impeachment:

1. Documents associated with Registrant's federal trademark application – Registration certificate.
2. Documents reflecting Registrant's trademark creation and first use of its Mark – Trademark design and receipts of initial business transactions in the United States, as well as receipts for other business transactions and communication with suppliers. Identity of suppliers are confidential for competitive reasons.
3. Documents reflecting Registrant's goods – Registrant's products and a live functional website.
4. Documents reflecting Registrant's business application – Registration certificate of NIVO, LLC.

Registrant reserves the right to amend this list upon identification of other documents and things through discovery or through development of the issues.

Dated this 31st day of August, 2015.

Ivo N. Njabe

A handwritten signature in black ink, appearing to read "Ivo Njabe", written over a horizontal line.

Registrant

CERTIFICAT OF SERVICE

I hereby certify that a true and accurate copy of Registrant's Rule (26) (A) (1) Initial Disclosures has been served on:

GESTION DIANE LANCTÔT LTÉE

By mailing said copy on August 31, 2015, via First Class Mail, postage prepaid to:

F. Michael Sajovec

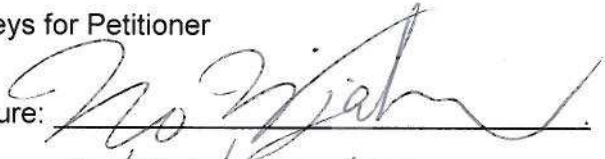
Peter D. Siddoway

Myers Bigel Sibley & Sajovec, P.A.

4140 Parklake Ave, Suite 600

Raliegh NC 27612

Attorneys for Petitioner

Signature: 

Date: 8/31/2015