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

Proceeding	92062923
Party	Plaintiff Topiclear, Inc.
Correspondence Address	DONALD L DENNISON LADAS & PARRY LLP 1700 DIAGONAL ROAD SUITE 505 ALEXANDRIA, VA 22314 UNITED STATES Email: ddennison@ladas.com
Submission	Other Motions/Papers
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Date	12/02/2017
Attachments	Topiclear12022017.pdf(79230 bytes )

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

TOPICLEAR, INC.,	]	Cancellation No. 92062923
Plaintiff,	]	
	]	
V.	]	
	]	
K & N DISTRIBUTORS,	]	
Defendant.	]	
	]	

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**PLAINTIFF'S PRETRIAL DISCLOSURES**

In accordance with 37 CFR §2.121(e) and Fed. R. Civ.P 26(a) (3), Plaintiff provides the following disclosures:

The only witness scheduled to testify for the Plaintiff will be:

John Graterol, Vice-President-Sales of Plaintiff  
5810 NW 163<sup>rd</sup> Street  
Miami Lakes, Florida 33014  
Phone: (305) 621-6555

Mr. Graterol is expected to testify as to the origin and development of Plaintiff's trademarks that are the basis of this proceeding as well as the goods of Plaintiff, their distribution and sales. He will also testify regarding Plaintiff's advertising and issues of likelihood of confusion between Plaintiff's products and those of Defendant relative to the marks of the parties.

In support of his testimony, Plaintiff presently plans to introduce documentary evidence in the form of advertising materials, packaging, sales figures and certified copies of Plaintiff's United States trademark registration certificates.

Respectfully submitted,



Donald L. Dennison  
Attorney for Plaintiff  
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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Pretrial Disclosures was served upon counsel for the Defendant by e-mail this 1st day of December, 2017 addressed to carrie.shufflebarger@thompsonhine.com.



Donald L. Dennison