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

Proceeding	91188416
Party	Plaintiff D-Col, Inc.
Correspondence Address	Patrick J. Stolmeier D-Col, Inc. 219 East Craig Place san antonio, TX 78212 UNITED STATES patrick@stolmeierlaw.com
Submission	Motion to Compel Discovery
Filer's Name	Patrick J Stolmeier
Filer's e-mail	patrick@stolmeierlaw.com
Signature	/Patrick J Stolmeier/
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Very truly yours,

Patrick J. Stolmeier
For D-Col, Inc.

c.c. Trademark Trial and Appeal Board

**UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board**

**Opposition No. 91188416
Serial No. 77540851**

D-Col, Inc.

V.

Young, Terry L.

**INTERROGATORIES, REQUEST FOR PRODUCTION OF
DOCUMENTS AND THINGS, ADMISSIONS AND DISCLOSURE**

**TO: Terry L. Young, 20770 N Hwy 281, Suite 108, San Antonio, Texas 78258-7500, e-mail -
srt3000@msn.com.**

Please take notice that pursuant to the Rules of Procedure, D-Col, Inc. serves the attached Interrogatories, Request for Production of Documents and Things, Admissions and Disclosure propounded to Terry L. Young, 20770 N Hwy 281, Suite 108, San Antonio, Texas 78258-7500.

You are hereby instructed to answer the following interrogatories separately, fully, in writing, and under oath pursuant to the Rules of Procedure.

Your failure to make timely answers may subject you to sanctions as provided in the Rules of Procedure.

Furthermore, demand is made for the supplementation of your answers to these Interrogatories, Request for Documents and Things, Admissions and Disclosure as required by the Rules of Procedure.

Furthermore, produce or permit D-Col, Inc., to inspect and copy or reproduce the items requested in the Request for Production of Documents and Things.

D-Col, Inc.
219 E. Craig Place
San Antonio, Texas 78212
(210) 227-3612
(210) 227-3621 (FAX)

BY: _____

D-Col, Inc.

CERTIFICATE OF SERVICE

I certify that a true copy of the above was served on Terry L. Young in accordance with the United States Patent and Trademark Office Trial and Appeal Board Rules on March 26, 2009.

D-Col, Inc.

DEFINITIONS AND INSTRUCTIONS

a. As used herein, the terms "you", "your" and "Defendant" shall refer to Terry L. Young, 20770 N Hwy 281, Suite 108, San Antonio, Texas 78258-7500, and the attorneys, agents, and all other natural persons or business or legal entities acting or purporting to act for or on behalf of Terry L. Young, 20770 N Hwy 281, Suite 108, San Antonio, Texas 78258-7500, whether authorized to do so or not.

b. The term "documents" shall mean all writings of every kind, source, and authorship, both originals and all nonidentical copies thereof, in your possession or known by you to exist, irrespective of whether the writing is one intended for or transmitted internally by you, or intended for or transmitted to any other person or entity, including without limitation any government agency, department, administrative entity, or any private entity, or any person.

In accordance with the Rules of Procedure, a document is deemed to be in your possession, custody or control if you either have physical possession of the item or have a right to possession of the item that is equal or superior to the person who has physical control of the item.

The term shall include e-mails, computer generated and stored content, material and data, handwritten, typewritten, printed, photocopied, computer generated, computer stored, photographic, or recorded matter. It shall include communications in words, symbols, pictures, sound recordings, films, tapes, and information stored in, or accessible through, computer or other information storage or retrieval systems, together with the codes and/or programming instructions and other materials necessary to understand and use such systems. For purposes of illustration and not limitation, the term shall include: affidavits; agendas; agreements; analyses; announcements; bills, statements, and other records of obligations and expenditures; books; brochures; bulletins; calendars; canceled checks, vouchers, receipts and other records of payments; charts, drawings; check registers; checkbooks; circulars; collateral files and contents; contracts; corporate by-laws; corporate charters; correspondence; credit files and contents; deeds of trust; deposit slips; diaries, drafts; files; guaranty agreements; instructions; invoices; ledgers, journals balance sheets, profit and loss statements, and other sources of financial data; letters; logs, notes, or memoranda of telephonic or face-to-face conversations; manuals; memoranda of all kinds, to and from any persons, agencies, or entities; minutes; minute books; notes; notices; parts lists; papers; press releases; printed matter (including published books, articles, speeches, and newspaper clippings); purchase orders; records; records of administrative, technical, and financial actions taken or recommended; reports; safety deposit boxes and contents and records of entry; schedules; security agreements; specifications; statement of bank accounts; statements, interviews; stock transfer ledger; technical and engineering reports, evaluations, advice, recommendations, commentaries, conclusions, studies, test plans, manuals, procedures, data, reports, results, and conclusions; summaries, notes, and other records and recordings of any conferences, meetings, visits, statements, interviews or telephone conversations; telegrams; teletypes and other communications sent or received; transcripts of testimony; UCC instruments; workpapers; and all other writings, the contents of which relate to, discuss, consider, or otherwise refer to the subject matter of the particular discovery requested.

c. "Person": The term "person" shall include individuals, associations, partnerships, corporations, and any other type of entity or institution whether formed for business purposes or any other purposes.

d. "Identify" or "Identification":

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