

Exhibit 1

MYA SARAY, LLC

Plaintiff,

**AL-AMIR IN.,
&
ALI-HAMMOUD,**

Defendant.

Civil Action No. 1:10-cv-789

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NOW COMES, Defendants, by and through their attorneys, Nabih H. Ayad & Associates P.C., by Nabih H. Ayad, and pursuant to the Federal Rules of Civil Procedure, and propounds the following Interrogatories and Requests For Production Of Documents And Things to Plaintiff. Plaintiff is directed to respond within thirty (30) days of service thereto.

INSTRUCTIONS

1. If the information requested by any Request is contained in documents, papers or records in the custody of Plaintiff, you may so indicate and answer that Request by attaching copies of such documents or papers to your answers and by indicating the Request to which those documents or papers are deemed responsive.
2. These Interrogatories call for all information available to the Plaintiff, their employees, and agents with respect to the subject matter into which they inquire. If some of the information is known by or available to a particular employee or agent, please include in your answers all information known by or available to each employee or agent. Please identify which employee or agent provided information with respect to each answer.
3. Where a claim of privilege or attorney work product is asserted in objecting to any Request, or subpart thereof, identify the privilege claimed, and if the privilege is governed by state law, indicate the state privilege rule being invoked. If an objection goes to the production of a document, identify in writing each document so withheld by providing at least the following information:
 - a. the title, date and the subject matter of this document;
 - b. the title and the position of the sender of the document;
 - c. the identity and position of each person who participated in the preparation of the document or on whose behalf the document was prepared;
 - d. the identity and position of all persons (1) to whom the document was addressed, (2) to whom the document was sent, (3) who have seen the document, (4) who have possession or custody of the document, or (5) who have had disclosed to them any of the contents of the documents;
 - e. a detailed statement of the basis for withholding the document, including facts establishing any claim of privilege, facts showing that the privilege had not been waived and the status of the person claiming the privilege, and
 - f. Identify and produce each segregable portion of any document to which the claim of privilege, attorney work product or other basis for withholding the document does not apply.

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If the claim of privilege or work product goes to an oral communication, please provide the following information:

- i. the name of the person making the communication and the names of the persons present when the communication was made,
- ii. the date and the place of the communication,
- iii. the general subject matter of the communication, and
- iv. a detailed statement of the basis for withholding the document, including facts establishing any claim of privilege, facts showing that the privilege has not been waived and the status of the person claiming the privilege.

DEFINITIONS

For purposes of these Requests, certain terms are defined as following:

- a. The term “identify” and “set forth the identity of”, when used in reference to a natural person, they mean to state the person's full name, current residence and business addresses, current residence and business telephone numbers and, if applicable, his or her title, dates of employment, and job description. If current addresses are unknown, provide the last known business and residence address;
- b. The term “identify” and “set forth the identity of”, when used in reference to a document, they mean to state the type of document (e.g., letter, memorandum, telegram, chart, etc.), its author and originator, its date or dates, all addressees and recipients, and its present location or custodian. If any such document was, however, is no longer in your possession or subject to your control, state what disposition was made of it, including the date that it left your possession or control and identify the person to whom you transferred it.
- c. The term "in your possession," as used herein, refers to any document contained in any file or archive maintained by you or an officer thereof; in the possession of Plaintiff; or in the possession of any entity which performs management services on behalf of Plaintiff, or of any individual now or formerly employed by such entity.
- d. The term “Produce” and “provide” mean to provide either a legible true copy of the original or any document and/or communication.
- e. The following definitions from Plaintiff’s first discovery requests are adopted and used herein:
 - i. “AL-AMIR” shall refer to Al-Amir, Inc., a Michigan corporation and Defendant in the above captioned matter.

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- ii. "HAMMOUD" shall refer to Ali Hammoud, an individual and Defendant in the above captioned matter.
- iii. "YOU" or "YOUR" (or any derivative thereof) shall refer to MYA SARAY including its parent companies, subsidiaries, affiliates, employees, agents, officers, directors, attorneys, contractors, accountants, consultants, investigators, predecessors and successors-in-interest and all persons acting or purporting to act on their behalf.
- iv. "PLAINTIFF" shall refer to MYA SARAY, the Plaintiff in the above captioned matter.
- v. "COMPLAINT" shall refer to the complaint filed by Plaintiff.
- vi. "RELEVANT PERIOD" shall refer to the period from November 20, 2008 to the present. Unless otherwise designated, all inquiries are restricted to the Relevant Period. The express use of Relevant Period does not subtract from the effect of the previous sentence.
- vii. "USPTO" means the United States Patent and Trademark Office.
- viii. "PACKAGING," shall refer to any and all logos, labels, and containers by which You enclose Your products.
- ix. "SUBJECT PATENTS" shall refer to the USPTO Reg. No. 3,031,439 ("439"), Reg. No. 3,031,440 ("440"), Reg. No. 3,845,276 ("276"), and Reg. No. 7,404,405 ("405").
- x. "SETTLEMENT AGREEMENT" shall refer to the settlement agreement entered into between Plaintiff and Defendant for Case No.: 1:08-CV-479.
- xi. "CHANNELS OF TRADE" shall refer to the methods by which You sell tobacco products, including, but not limited to, via mail order, internet, facsimile and telephone sales, use of agents to sell directly to customers on Your behalf, and distribution of products to retailers.

INTERROGATORIES

Interrogatory 1. Set forth all facts that support your allegation that between June 2005 and September 2007, that Al-Amir engaged in unacceptable trade practices, and said conduct caused Mya Saray to refuse to continue to distribute tobacco products to Al-Amir.

Interrogatory 2. Explain with specificity the reasons why You permitted Defendants to sell the Jamilia as part of the Settlement Agreement.

Interrogatory 3. State every fact known by you that supports your allegation that Al-Amir

is not appropriately marking the source of its Jamilia hookahs by the Jamila trademark or by the manufacturing source, Kassir Co.

Interrogatory 4. State every fact known by you that supports your allegation that Al-Amir did, and does now, without permission distribute, cause the manufacture of, advertise, publicize, sell, and offer to sell to merchants and consumers hookah products not originating from Mya Saray in a carrying container confusingly similar to the Mya Closed Top Carrying Cage.

Interrogatory 5. State every fact known by You evidencing Your allegation that Al-Amir did, and does now, without permission distribute, cause the manufacture of, advertise, publicize, sell and offer to sell to merchants and consumers hookah products not originating from Mya Saray that are confusingly similar to the Mya Saray QT Hookah, the Mya Word Mark, the Mya Design Mark, and the other Subject Patents.

Interrogatory 6. State every fact known by You evidencing Your allegation that Al-Amir prominently displays and uses the Mya Word Mark and the Mya Design Mark in connection with hookah products not originating from Mya Saray.

REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS

Request to Produce 1. Produce all documents which You believe demonstrates that Defendants' alleged use of the Subject Patents has or is likely to cause consumer confusion.

Request to Produce 2. Produce all documents that evidencing any damages that You believe that You have suffered as a result of the conduct alleged in Your Complaint.

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Request to Produce 3. Produce all documents evidencing Your allegation Al-Amir did and does now use the Prohibited Trademark Terms, including the Mya World Mark.

Request to Produce 4. Produce all documents that relate to the creation and/or adoption of the Subject Patents.

Request to Produce 5. Produce all documents evidencing Your allegation that on or about June 2005, Al-Amir began to purchase tobacco products in substantial quantity from Mya Saray.

Request to Produce 6. Produce all documents evidencing Your allegation that Al-Amir engaged in unacceptable trade practices, and said conduct caused Mya Saray to refuse to continue to distribute tobacco products to Al-Amir.

Request to Produce 7. Produce all documents evidencing Your first commercial use of the Subject Patents.

Request to Produce 8. Produce all documents evidencing Your allegation that Mya Saray distributes, advertises, publicizes, sells and offers to sell products within a carrying container, depicted in Exhibit I of Your Complaint.

Request to Produce 9. Produce all documents evidencing Your allegation that Al-Amir did, and does now, without permission distribute, cause the manufacture of, advertise, publicize, sell, and offer to sell to merchants and consumers hookah products not originating from Mya Saray in a carrying container confusingly similar to the Mya Closed Top Carrying Cage.

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Request to Produce 10. Produce all documents in Your possession that relate to Case No. 1:08-cv-479, that are neither privileged nor excluded by the attorney work product doctrine.

Request to Produce 11. Produce all documents evidencing Your allegation that Al-Amir did, and does now, without permission distribute, cause the manufacture of, advertise, publicize, sell and offer to sell to merchants and consumers hookah products not originating from Mya Saray that are confusingly similar to the Mya Saray QT Hookah, the Mya Word Mark, the Mya Design Mark, and the other Subject Patents.

Request to Produce 12. Produce all documents, evidencing your allegation that Al-Amir violated the Settlement Agreement by distributing, selling, marketing, advertising, importing, vending, and purchasing copies of the QT hookah and its individual components, including the QT Base and Stem.

Request to Produce 13. Produce all documents, including but not limited to invoices, sales receipts, and other similar documents that support the claim in your complaint that Plaintiff has made continuous use of the Subject Patents.

Request to Produce 14. Produce all documents, in Your possession, for the Relevant Period, that evidences your allegation that Al-Amir is not appropriately marking the source of its Jamilia hookahs by the Jamila trademark or by the manufacturing source, Kassir Co.

Request to Produce 15. Produce a physical specimen of the QT Hookah.

Request to Produce 16. Produce a physical specimen of the Mya Closed Top Cage.

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Request to Produce 17. Produce a physical specimen of any product produced by you that implements the Subject Patents.

Request to Produce 18. Produce all catalogs, brochures, leaflets, menus, or other advertising, whatsoever, in which Plaintiff has advertised the Subject Patents since your first claimed use of the Subject Patents.

Request to Produce 19. Produce all documents, for the Relevant Period, that evidence the volume of sales from products bearing the Subject Patents.

Request to Produce 20. Produce all documents that evidence Plaintiff's profit from the use of the Subject Patents during the Relevant Period.

Request to Produce 21. Produce a copy of any and all alleged cease and desists demands made by Plaintiff to Defendants in connection with the Subject Patents and/or the above entitled case.

Request to Produce 22. Produce all Documents which relate to any litigation that Plaintiff has been, or is involved with, against any third-party which relates in any manner to the Subject Patents.

Request to Produce 23. Produce all Documents relating to any inquiries or reviews relating to any connection between Plaintiff and the Subject Patents, since your first alleged use of the Subject Patents.

Request to Produce 24. Produce all Documents and Communications relating from third parties to Plaintiff regarding similarities or differences between Plaintiff's Subject Patents and the Accused Marks.

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Request to Produce 25. Produce all documents relating to the Channels of Trade through which Plaintiff sold products with the Subject Patents since the first use of the Subject Patents.

Request to Produce 26. Produce all Documents that show the geographic locations at which the Subject Patents have been used, sold or advertised during since the first commercial use of the Subject Patents.

Request to Produce 27. Produce all Documents relating to the sale of the Subject Patents within the United States during the Relevant Period, including, by way of example but not limitation, all purchase orders, wire transfers, invoices, receipts, contracts, agreements, and/or sales summaries.

Request to Produce 28. Produce any and all documents, including but not limited to invoices, receipts, balance sheets, general ledgers, cash receipts, cash disbursements, accounts receivables, accounts payables, bank statements and/ or federal and state income tax returns showing the amount of profit earned, for the sale of products using the Subject Patents during the Relevant Period.

Request to Produce 29. Produce Documents sufficient to indicate the percentage of Plaintiff's total revenues that derives from the sale of products using the Subject Patents from the date of your first commercial use to the present.

Request to Produce 30. Produce any and all consumer surveys that relate to the use of the Subject Patents during since the Relevant Period.

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Request to Produce 31. Produce a complete copy of any and all discovery requests propounded, along with the respective responses, which were produced during the prior litigation between these parties.

Request to Produce 32. Please produce all documents sufficient to identify the permissive use and or license of the Subject Patents to Third Parties since Plaintiff's first commercial use of the Subject Patents.

Request to Produce 33. Please produce any and all documents that you intend on using as exhibits at trial.

NABIH H. AYAD & ASSOCIATES

/s/ Nabih H. Ayad

NABIH H. AYAD (P59518)

Attorneys for Defendants

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Dated: March 2, 2011

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instruments were served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses as directed on the pleadings on 2/3, 2011 by:

☒ US MAIL ☐ FAX ☐ HAND DELIVERY ☐ UPS ☒ EMAIL ☐ ECF

/s/ Steven J. Ogilvie

Steven J. Ogilvie