



DISCOVERY ATTACK PLAN

THE RIDLEY INTERROGATION

Written Discovery, Rule 30(b)(6) Topics, and the Deposition Map

Ridley USA Inc. v. DWD Ventures LLC d/b/a “Lyx Hydration”

Case No. 4:26-cv-00854 · U.S. District Court, Northern District of Texas, Fort Worth Division

Hon. Mark T. Pittman · Filed July 13, 2026 · 15 U.S.C. § 1114 · Jury demanded by Plaintiff

Prepared by KNOX for DWD Ventures LLC and its counsel

August 27, 2026 · Built on the Adversary Intelligence Dossier of August 7, 2026

CONFIDENTIAL ATTORNEY WORK PRODUCT. PREPARED IN ANTICIPATION OF LITIGATION. This document is internal strategic analysis and proposed discovery, compiled entirely from lawful public sources: federal dockets, USPTO and TTAB records, the USPTO Assignment Center, secretary of state filings, corporate publications and press. It is not legal advice and it is not a filing. Every request must be reviewed, renumbered and served by licensed counsel admitted in the Northern District of Texas, and conformed to the operative scheduling order, the Court's standing requirements and Local Rules. Confidence labels appear where a proposition rests on inference rather than a primary record.

CONTENTS

- 0. How to use this document, and what changed since August 7
- 1. The pressure points, ranked
- 2. Requests for admission, set one · 42 requests, each a single fact
- 3. Interrogatories, set one · 25 under the Rule 33 cap
- 4. Requests for production, set one · 31 requests in seven groups, deliverable early under Rule 26(d)(2)
- 5. Rule 30(b)(6) deposition topics, Ridley USA Inc. · 22 topics
- 6. The org chart and the deposition map
- 7. Sequencing, the held reserve, and where the traps close
- 8. Exhibit index
- 9. Confidence statement and open items

0. HOW TO USE THIS DOCUMENT

This is the discovery instrument set for the defense of DWD Ventures LLC, built directly on the ten armor chinks identified in the Adversary Intelligence Dossier dated August 7, 2026, and on a fresh chain of title and portfolio audit run August 27, 2026 against primary USPTO records. It is organized so that counsel can lift requests substantially as written.

WHAT CHANGED SINCE THE AUGUST 7 DOSSIER

The August 7 dossier flagged, at **MEDIUM confidence**, that the Alltech and ADM joint venture might have moved the pleaded LYX registrations out of Ridley USA Inc., and said in terms that an audit was required. **The audit has now run and that theory is closed.** The recorded instrument at Reel/Frame 9154/0662 conveys sixty nine marks from Ridley USA Inc. to Akralos Animal Nutrition LLC, and not one of them contains LYX or LIX. Ridley USA Inc. remains the record owner of all seventeen marks in the LYX family, all seventeen are live, and the company is active and qualified to transact business in Texas. **Do not plead a standing defect premised on the Akralos transfer.** It is refutable with a single exhibit and would cost credibility on the defenses that do work.

What the audit found in its place is materially stronger, and none of it appeared in the August 7 dossier: a portfolio maintenance collapse that is still happening, a pleaded registration that was allowed to die and then rushed back through an expedited petition, an unreleased security interest on every single asserted registration, and a parent company granting liens on marks it has never owned. Those four threads drive pressure points 1 through 4 below.

THE SEVEN PROCEDURAL CONSTRAINTS THAT SHAPE EVERY REQUEST

Constraint	What it means for this set
Rule 33(a)(1) limits interrogatories to 25 including all discrete subparts	Section 3 contains 25 as a court would count them: each interrogatory asks one question, and the counting note there shows the design. Anything further requires a stipulation or leave.
Rule 36 places no numeric limit on requests for admission by federal rule	Section 2 therefore carries the heaviest load. Check the operative scheduling order for a local cap before serving.
Rule 30(b)(6) requires a good faith conference on the topics before or promptly after the notice (2020 amendment)	Section 5 is drafted as a conferrable list, with the matters stated with the particularity the rule requires.
The court applies the local rules strictly. The August 7 dossier's docket read records Doc. 7 assigning the case to Judge Mark T. Pittman and Doc. 12, entered one day after the pro se motion, unfiled it under LR 7.1(c). CourtListener's mirror carries no judge field and no Doc. 11 text	Every motion needs its certificate of conference and proposed order; assume zero tolerance for form errors. Confirm the judge and the Doc. 11 sequence on PACER before relying on judge specific practice notes.
Rule 26(d)(1) bars discovery from any source before the Rule 26(f) conference , absent stipulation or court order	Nothing in this document may be served until the Rule 26(f) conference has occurred. The docket moved on August 19, 2026: Doc. 15 is an ANSWER TO COMPLAINT AND COUNTERCLAIM, and Doc. 17 is an order for a scheduling order proposal. The pleading crisis is over, counsel is on file, and the Rule 26(f) window is opening now, which makes this plan timely rather than premature. Rule 45 subpoenas remain inside the bar until the conference.
Rule 30(a)(2)(A)(i) requires leave for more than ten depositions per side ; Rule 30(d)(1) caps each at seven hours	Section 6 maps more witnesses than ten. Prioritize, or obtain a stipulation in the Rule 26(f) report before any notice issues.
Rule 26(b)(1) proportionality	Each request below states the pressure point or exhibit basis it serves, individually or at its group, so relevance and proportionality can be defended in one sentence at the hearing.

THE EXHIBIT DISCIPLINE

Every request in this document, admissions, interrogatories, document requests and deposition topics alike, carries an **EXHIBIT BASIS** line naming the record that supports it, individually or at its group, or, where a request seeks information within Ridley's sole knowledge, saying so in terms. The citations are the kind a lawyer can pull and mark: a reel and frame at the USPTO Assignment Center, a registration or serial number with its TSDR status view, a TTABVue proceeding and entry, a

docket document number, or a dated publication with its URL. Section 8 opens with a designation table mapping every exhibit label used in a basis line to the record it stands for, so any request can be defended at a hearing, or attached to a Rule 36(a)(6) motion, without a second research pass. Where a source is secondary, it is labeled and the primary that must be pulled before filing is named.

1. THE PRESSURE POINTS, RANKED

Discovery is not a fishing expedition here. There are eleven specific propositions that decide this case, and every request below is built to force an admission, a document, or a witness answer on one of them. They are ranked by how much damage a favorable answer does to Ridley's case.

#	Pressure point	What the record shows	What a favorable answer buys
1	The maintenance collapse	Fourteen -LYX and -LIX registrations have gone dead, and a fifteenth application was expressly abandoned before registration, seven of them since 2023, almost all for failure to file a Section 8 declaration. STABLE-LYX, one of the seventeen registrations pleaded in the amended notice in the DWD opposition, has its Section 8 and 9 due September 2, 2026 with nothing filed. IONO-LYX and POWER-LYX are in the same posture within five months.	Destroys the vigilant policing narrative and cuts the legs from family of marks: you cannot claim the public recognizes a family you keep letting expire.
2	The BUFFER-LYX resurrection	Registration 2897926 was cancelled May 9, 2025 for failure to file. Six weeks later Ridley filed for the identical mark, identical goods and the identical claimed October 13, 2003 first use date, obtained an expedited petition to make special, and re-registered October 14, 2025. Pleded in the amended notice in the DWD opposition and in the PETALYX opposition. Confirm the federal complaint's list against Doc. 1 before service.	A rights gap from May to October 2025, no incontestability, and a fair inference of litigation purpose. Confidence on the inference: MEDIUM.

#	Pressure point	What the record shows	What a favorable answer buys
3	Every asserted registration is encumbered	Sixteen registrations sit under two unreleased security interests, to Bank of America and to Wilmington Trust, verified against both property schedules; BUFFER-LYX, which postdates both, was pledged separately in April 2026.	Leverage and burden, not a standing defeat: a security interest does not divest a registrant of title. The value is compelled production of the collateral papers, the Alltech anomaly, and settlement friction.
4	Alltech granted liens on marks it does not own	Alltech Inc. has never been a record owner of any of these registrations, yet it granted security interests over them twice, in 2020 and again in 2024.	Either there is an unrecorded transfer or license Ridley has not disclosed, or the grant was ineffective as to these marks. These are ALTERNATIVES, not companions: if the Alltech grant conveyed nothing, the second lien does not encumber these marks and pressure point 3 rests on the Bank of America instrument alone. Plead in the alternative. Confidence on the unrecorded transfer inference: MEDIUM.
5	Forty nine years, zero pet products	No standalone use of LYX and no companion animal product under any pleaded mark. The GUTCIE registration is the one place pets ever appeared in the portfolio, and that language was deleted.	Kills the natural zone of expansion argument and narrows the goods gap to a chasm.

#	Pressure point	What the record shows	What a favorable answer buys
6	Family of marks had to be repleaded	The Board granted Ridley leave to amend orally at the discovery conference held November 16, 2025, per its own March 13, 2026 order; the amended notice arrived November 25, 2025, fifteen months after DWD's August 20, 2024 constructive use priority date, itself contingent on registration under Section 7(c).	Ridley must prove family recognition among dog owners as of a date long before it managed to plead the family correctly.
7	Nothing is marketed as a family	Ridley Block Operations markets four brands. Two of them, Blueprint and Stockade, contain no LYX at all. The flagship sibling is spelled SWEETLIX. Each brand runs a separate website and separate social accounts.	Family of marks requires joint promotion creating public recognition of the shared feature. The public record shows the opposite.
8	The crowded field, and forty nine years of silence	LIXIT marks have been on pet and small animal drinking products since a claimed first use of November 17, 1954, twenty two years before CRYSTALYX; the registration now sits with Miller Manufacturing Company. HORSLYX has been registered since 2005; the surviving registration, renewed in 2024, now sits with Fevara (UK) Limited, and two later HORSLYX registrations died in 2022 of the same Section 8 failure that felled Ridley's own marks. Ridley has never challenged any of them.	Coexistence without confusion, and a policing record that contradicts the complaint.

#	Pressure point	What the record shows	What a favorable answer buys
9	Zero actual confusion	No documented instance of any consumer, retailer or publication confusing LYX with CRYSTALYX, and no identified channel overlap.	The most heavily weighted digit in practice, and it is empty for them.
10	Dilution was not pleaded	The cause of action is Section 1114 infringement. If fame among the general consuming public were available, competent counsel would have pleaded it.	An implicit concession that the mark's fame is confined to a niche. Hold for summary judgment framing.
11	Revealed preference: they fold	Sued for infringement by Ragland Mills in 2018, Ridley never filed an answer and resolved with prejudice in four months. Its TTAB pattern is extensions of time, not litigation.	Calibrates settlement. Also frames the escalation here as forum selection rather than merits.

The single most time sensitive item in this document. STABLE-LYX, Registration No. 1407344, is one of the seventeen registrations pleaded in the amended DWD opposition. Its Section 8 and Section 9 filings are due **September 2, 2026**, six days from the date of this document, and as of the TSDR record generated August 27, 2026 nothing has been filed. **A six month grace period runs to March 2, 2027, so nothing cancels on September 3.** The September date is when the failure becomes a documented fact; March 2, 2027 is the drop dead. Diary both and re-pull the status on each. IONO-LYX and POWER-LYX reach the same posture on January 28 and January 30, 2027. The capture requests are drafted and HELD, deliberately unserved until the grace periods run, because serving them earlier is a cure memo to opposing counsel; Section 7 carries the held reserve.

2. REQUESTS FOR ADMISSION, SET ONE

Rule 36 carries no numeric limit by federal rule, which makes admissions the cheapest and sharpest instrument in this case. Rule 36(a)(2) requires each matter to be separately stated, so compound facts are split rather than bundled: the set runs to forty two requests, each asking one thing. Denials are as useful as admissions, within limits counsel should state plainly to the client: Rule 36 has no motion to compel an admission and a court will not order a party to admit a fact it denies. What Rule 36(a)(6) allows is a motion to determine the SUFFICIENCY of an answer or objection, and Rule 37(c)(2) allows fees only if the matter is later PROVED true, subject to four exceptions. What a denial reliably buys is a question the witness must defend under oath.

Definitions to incorporate. “ASSERTED REGISTRATIONS” means the registrations identified in the Complaint in this action, and “ASSERTED MARKS” means the marks shown in them. “LYX FAMILY” means the family of marks YOU allege in this action or in TTAB Opposition No. 91300524. “COMPANION ANIMAL” means a dog or a cat. “RIDLEY BLOCK OPERATIONS” means YOUR division doing business as Ridley Block Operations, per the terms of use at crystalyx.com identifying “Ridley USA Inc. d/b/a Ridley Block Operations.” “AFFILIATE” means any entity that controls, is controlled by, or is under common control with YOU, including Alltech, Inc. “YOU” and “YOUR” mean Ridley USA Inc. and its officers, directors, employees, agents, predecessors and any person acting on its behalf, excluding counsel to the extent a response would disclose information protected by the attorney client privilege or the work product doctrine.

BUFFER-LYX is pleaded at the TTAB. The operative amended notice of opposition in No. 91300524 (11 TTABVUE, November 25, 2025) pleads **seventeen registrations in its Paragraph 6 chart, BUFFER-LYX Reg. 7985825 among them**, with a footnote recording its October 14, 2025 registration; its incontestability paragraph lists only the sixteen older marks. TTABVUE's summary panel still shows the original sixteen and is stale; the filed pleading controls. The same seventeen are pleaded in the PETALYX opposition. The federal complaint's own asserted list is the one record not yet pulled; confirm Doc. 1 before service.

A. The maintenance record

RFA 1. Admit that United States Trademark Registration No. 2897926 for BUFFER-LYX was cancelled on May 9, 2025 for failure to file a declaration under Section 8 of the Lanham Act.

EXHIBIT BASIS TSDR status view, Ser. No. 76523375, prosecution entry “CANCELLED SEC. 8 (10-YR)/EXPIRED SECTION 9,” dated May 9, 2025. Exhibit C-4. tsdr.uspto.gov/statusview/sn76523375

RFA 2. Admit that at the time YOU filed application Serial No. 99245105 for BUFFER-LYX on June 20, 2025, YOU owned no live United States registration for the mark BUFFER-LYX.

EXHIBIT BASIS TSDR, Ser. 76523375 (cancelled May 9, 2025) and Ser. 99245105 (filed June 20, 2025). Exhibit C-4.

RFA 3. Admit that YOUR request for special handling of application Serial No. 99245105 was granted on July 23, 2025.

EXHIBIT BASIS TSDR, Ser. 99245105, prosecution entries "TEAS PETITION TO DIRECTOR-MAKE SPECIAL" (June 23, 2025) and "REQUEST FOR SPECIAL HANDLING - GRANTED" (July 23, 2025). Exhibit C-4.

RFA 4. Admit that in application Serial No. 99245105 YOU claimed a date of first use identical to the date of first use claimed in cancelled Registration No. 2897926.

EXHIBIT BASIS TSDR, both serials: first use in commerce October 13, 2003. Exhibit C-4.

RFA 5. Admit that no declaration under Section 15 of the Lanham Act has been filed with respect to Registration No. 7985825.

EXHIBIT BASIS TSDR, Ser. 99245105, registered October 14, 2025; no Section 15 entry anywhere in the prosecution history, verified absent. Exhibit C-4.

Requests 6 through 14 take the dead registrations one at a time, as Rule 36(a)(2) requires. Each is a single fact on the face of a TSDR record.

RFA 6. Admit that United States Trademark Registration No. 5662231 for AGRILYX was cancelled or expired on or about August 1, 2025 for failure to file an acceptable declaration under Section 8.

RFA 7. Admit that United States Trademark Registration No. 2813675 for ROLYX was cancelled or expired on or about August 23, 2024 for failure to file an acceptable declaration under Section 8.

RFA 8. Admit that United States Trademark Registration No. 2757351 for SEED-LYX was cancelled or expired on or about March 8, 2024 for failure to file an acceptable declaration under Section 8.

RFA 9. Admit that United States Trademark Registration No. 2667116 for CREEP-LYX was cancelled or expired on or about July 7, 2023 for failure to file an acceptable declaration under Section 8.

RFA 10. Admit that United States Trademark Registration No. 2660547 for CALF-LYX was cancelled or expired on or about June 23, 2023 for failure to file an acceptable declaration under Section 8.

RFA 11. Admit that United States Trademark Registration No. 2644176 for WILD-LYX was cancelled or expired on or about May 12, 2023 for failure to file an acceptable declaration under Section 8.

RFA 12. Admit that United States Trademark Registration No. 1909120 for WHEAT-LYX was cancelled or expired on or about April 3, 2020 for failure to file an acceptable declaration under Section 8.

RFA 13. Admit that United States Trademark Registration No. 3628534 for TG-LYX was cancelled or expired on or about December 27, 2019 for failure to file an acceptable declaration under Section 8.

RFA 14. Admit that United States Trademark Registration No. 3477379 for ENERGY-LIX was cancelled or expired on or about March 1, 2019 for failure to file an acceptable declaration under Section 8.

EXHIBIT BASIS For RFA 6 through 14: TSDR status views for each serial, all owned by Ridley USA Inc. at death, each carrying the “did not file an acceptable declaration under Section 8” status. All twelve dead marks re-verified against TSDR on August 27, 2026. Exhibit C-6 collects them. The four pre 2015 deaths (VIGORLIX, VET-LYX, FARM-LYX, K-MOLIX) are reached by ROG 8 rather than admission, because ownership at death sat in predecessor entities.

RFA 15. Admit that YOU expressly abandoned application Serial No. 76228388 for EQUI-LYX after publication.

EXHIBIT BASIS TSDR, Ser. 76228388, express abandonment January 16, 2003. Cargill Limited had filed six successive extensions of time to oppose between April 22 and December 16, 2002; TTABVUE lists Cargill as “Potential Opposer” with the opposition number field blank. No opposition was ever instituted; the abandonment came while the extension still ran. Exhibit C-6.

RFA 16. Admit that Registration No. 1407344 for STABLE-LYX recites goods limited to a dietary feed supplement for horses.

EXHIBIT BASIS TSDR, Ser. 73581987, goods verbatim: “DIETARY FEED SUPPLEMENT FOR HORSES.” Exhibit C-5. NOTE: the STABLE-LYX maintenance status request is deliberately HELD, Section 7 explains why.

B. Ownership and encumbrance

RFA 17. Admit that each ASSERTED REGISTRATION that registered before 2025 is among the properties identified in the instrument recorded at Reel/Frame 7516/0491.

EXHIBIT BASIS USPTO Assignment Center, Reel/Frame 7516/0491, Bank of America, N.A. as Administrative Agent, executed October 15, 2021, recorded December 1, 2021, 215 properties. All sixteen pre 2025 marks verified present on the schedule itself, August 27, 2026. Exhibit B-2.

RFA 18. Admit that no release, discharge or termination of the security interest recorded at Reel/Frame 7516/0491 has been recorded at the United States Patent and Trademark Office.

EXHIBIT BASIS Assignment Center abstracts for all sixteen serials: the later releases of record, 7512/0838 and 7597/0748, were opened and read; the first terminates only the 2017 lien at 6006/0619 and its Section 5 expressly preserves the October 15, 2021 pledge, and the second releases only the May 2020 recordings at 6942/0937 and 7230/0450. Exhibits B-2 and B-5.

RFA 19. Admit that each ASSERTED REGISTRATION that registered before 2025 is among the properties identified in the instrument recorded at Reel/Frame 8750/0513.

EXHIBIT BASIS Assignment Center, Reel/Frame 8750/0513, second lien trademark security agreement, Wilmington Trust, N.A. as Administrative Agent, recorded November 14, 2024, 286 properties. All sixteen verified present on the schedule itself, August 27, 2026. Exhibit B-3.

RFA 20. Admit that no release, discharge or termination of the security interest recorded at Reel/Frame 8750/0513 has been recorded at the United States Patent and Trademark Office.

EXHIBIT BASIS Assignment Center abstracts for all sixteen serials: 8750/0513 is the last recorded document on each. Exhibit B-3.

RFA 21. Admit that on or about April 24, 2026 YOU granted a security interest in Registration No. 7985825 for BUFFER-LYX to Bank of America, N.A.

EXHIBIT BASIS Assignment Center, Reel/Frame 9248/0442, executed April 24, 2026, recorded April 27, 2026, four properties including BUFFER-LYX. The date is BEFORE this action was filed on July 13, 2026 and after TTAB Opposition No. 91300524 was filed on July 23, 2025. Exhibit B-4.

RFA 22. Admit that Alltech, Inc. has never been the owner of record of any ASSERTED REGISTRATION.

EXHIBIT BASIS Assignment Center abstracts of title for all seventeen LYX family serials. The chains run through Hubbard entities, 4 Seasons Marketing, LLC and SWEETLIX, LLC into Ridley Block Operations, Inc. or Ridley U.S. Holdings, Inc., then to Ridley USA Inc., and stop there. Exhibits B-6 through B-9.

RFA 23. Admit that the instrument recorded at Reel/Frame 8750/0513 identifies Alltech, Inc. as a grantor of a security interest in registrations owned of record by Ridley USA Inc.

EXHIBIT BASIS Assignment Center, Reel/Frame 8750/0513, conveying parties field. The same pattern appears at Reel/Frame 6942/0937 (2020). Exhibit B-3.

RFA 24. Admit that the assignment recorded at Reel/Frame 9154/0662, effective as of February 1, 2026 per its own recital, conveyed sixty nine trademarks to Akralos Animal Nutrition LLC, and that none of the sixty nine contains the letters LYX or LIX.

EXHIBIT BASIS Assignment Center, Reel/Frame 9154/0662, Schedule A. All sixty nine properties enumerated and checked individually, August 27, 2026; the closest string is HYDROLYTE. The instrument's own execution date blanks are unfilled; the February 1, 2026 date is the recital's and the cover sheet's. Signed by E. Michael Castle, II as President of Ridley USA, Inc. Exhibit B-1.

C. Forty nine years without a companion animal product

RFA 25. Admit that YOU have never sold a product for COMPANION ANIMALS under the mark CRYSTALYX.

EXHIBIT BASIS The two CRYSTALYX registrations and the CRYSTALYX VP registration recite cattle or livestock goods only: Reg. 1089036 "MINERAL PROTEIN SUPPLEMENT FOR CATTLE"; Reg. 3015473 "Mineral

Protein Supplement for Livestock Animals”; Reg. 3008011 (CRYSTALYX VP) “Feed Supplements for Livestock.” Exhibit C-5.

RFA 26. Admit that YOU have never sold a product for COMPANION ANIMALS under any ASSERTED MARK.

EXHIBIT BASIS Goods recitations for the whole LYX family, International Class 5, livestock and equine only. Exhibit C-5.

RFA 27. Admit that YOU have never used the term LYX standing alone, unaccompanied by any other word or element, as a trademark in United States commerce.

EXHIBIT BASIS No standalone LYX registration or application of record in YOUR portfolio; every pleaded mark is a compound. This proves absence of a REGISTRATION; the request asks about USE, which only Ridley can admit or deny. Expect a qualified answer and take the qualification to the 30(b)(6).

RFA 28. Admit that in the declaration under Section 8 accepted on December 2, 2022 for Registration No. 4913250 for GUTCIE, the goods “pets, and companion animals” were deleted from the identification.

EXHIBIT BASIS TSDR, Ser. 86710749, Reg. 4913250: goods show “[pets, and companion animals;]” in brackets, the Office convention for deleted wording, and the prosecution history entry “REGISTERED - PARTIAL SEC. 8 (6-YR) ACCEPTED” dated December 2, 2022. The deletion mechanism means Ridley itself dropped the pet goods for nonuse. The bracketed “[Animal foodstuffs]” class 31 identification was deleted the same way. Exhibit C-7.

RFA 29. Admit that no product YOU sell is formulated for consumption by dogs.

EXHIBIT BASIS Within Ridley’s own knowledge; no public record can prove it, which is why it is an admission rather than an exhibit. The crystalyx.com product index, all cattle, equine, sheep, goat and dairy, is the corroboration. Exhibit D-4.

RFA 30. Admit that YOU do not sell any product through a retail aisle, department or online storefront category dedicated to COMPANION ANIMAL products.

EXHIBIT BASIS Within Ridley’s knowledge; framed at aisle and department level deliberately, because a chain level question (the same Walmart, the same Tractor Supply) invites a truthful denial that manufactures overlap where none exists at the shelf.

D. The family that is not marketed as a family

RFA 31. Admit that RIDLEY BLOCK OPERATIONS markets brands that do not contain the letters LYX, including Blueprint and Stockade.

EXHIBIT BASIS Alltech’s own page for Ridley Block Operations names Crystallyx, Sweetlix, Blueprint and Stockade, and crystalyx.com’s terms of use identify “Ridley USA Inc. d/b/a Ridley Block Operations,” which places the division inside YOU. Exhibit D-3. Know before serving: the same Alltech page displays all four brands together, and the Blueprint site is operated under Hubbard Feeds and cross sells CRYSTALYX formulations; Section 9 carries both.

RFA 32. Admit that the mark SWEETLIX is spelled with the letters L, I, X and not with the letters L, Y, X.

EXHIBIT BASIS SWEETLIX Regs. 762839, 935259, 7421945, all live, all Ridley USA Inc., re-verified August 27, 2026. Exhibit C-8.

RFA 33. Admit that each of the brands CRYSTALYX, SWEETLIX, Blueprint and Stockade is promoted through its own separate website.

EXHIBIT BASIS crystalyx.com, sweetlix.com, blueprintanimalnutrition.com, stockadebrands.com, each live as of August 27, 2026. Exhibit D-4.

RFA 34. Admit that YOUR original Notice of Opposition in TTAB Opposition No. 91300524 did not plead ownership of a family of marks, and that YOUR amended notice filed November 25, 2025 did.

EXHIBIT BASIS TTABVUE, Opp. No. 91300524: entries 9 (September 28, 2025, conference ordered), 10 (November 16, 2025, conference held), 11 (November 25, 2025, amended pleading). Leave was granted orally at the conference: the Board's March 13, 2026 order (17 TTABVUE) states "In the discovery conference, the Board gave Opposer leave to file (and Opposer did so file) an amended notice of opposition." Exhibit A-5.

RFA 35. Admit that YOU have never commissioned a consumer survey measuring recognition of the letters LYX as an indicator of source among purchasers of COMPANION ANIMAL products.

EXHIBIT BASIS Within Ridley's knowledge; no public record can prove it. A denial produces the survey in discovery through RFP 3; an admission closes the LYX FAMILY theory's evidentiary gap permanently.

E. The crowded field

RFA 36. Admit that products bearing the mark LIXIT have been sold for use with dogs in the United States for more than forty years.

EXHIBIT BASIS LIXIT Reg. No. 1839458, first use November 17, 1954, in commerce February 14, 1955; predecessor Reg. 0954296. The registration is now owned by Miller Manufacturing Company, Eagan, Minnesota, per the assignment at Reel/Frame 9204/0597 recorded February 3, 2026 and the automatic ownership update of May 27, 2026; Lixit Corporation is the original registrant. Retail listings at Walmart, Chewy, Amazon and Tractor Supply pulled August 27, 2026. Rule 36(a)(4) permits a lack of knowledge answer on a third party's sales; the request puts the reasonable inquiry obligation on record. Exhibit E-1.

RFA 37. Admit that YOU have never filed an opposition, a petition to cancel, or a civil action against Lixit Corporation or Miller Manufacturing Company concerning the mark LIXIT.

EXHIBIT BASIS TTABVUE party search "LIXIT" returns no proceedings. Caveat on TTABVUE's own page: extensions of time to oppose are indexed by serial number and do not surface in a party search; the request is framed to opposition, cancellation and civil action for that reason. Exhibit E-1.

RFA 38. Admit that YOU have never filed an opposition, a petition to cancel, or a civil action concerning the mark HORSLYX.

EXHIBIT BASIS HORSLYX Reg. 2922064, registered February 1, 2005, LIVE, renewed June 18, 2024, current owner of record FEVARA (UK) LIMITED; Carrs Agriculture Limited was the registrant. Two later HORSLYX

registrations, 4915432 and 4915863, were cancelled September 23, 2022 for failure to file a Section 8 declaration. TTABVUE party search "CARRS" returns three proceedings, none involving Ridley; same serial level caveat as RFA 37. All re-verified August 27, 2026. Exhibit E-2.

F. Confusion and the escalation

RFA 39. Admit that YOU are not aware of any instance in which a consumer was actually confused as to the source of a product sold under the mark LYX by DWD Ventures LLC.

EXHIBIT BASIS Within Ridley's knowledge; the negative cannot be documented from outside. The corroborating absence: no confusion instance found in any public source as of August 27, 2026, searched across Amazon, Chewy, Walmart, Tractor Supply listings and reviews, Reddit, cattle forums and trade press.

RFA 40. Admit that no product of YOURS is sold in the same retail aisle, department, or online storefront category as any product sold under the mark LYX by DWD Ventures LLC.

EXHIBIT BASIS Framed at aisle and department level for the same reason as RFA 30. CRYSTALYX moves through farm and ranch dealers and Tractor Supply's livestock category; LYX sells DTC and in Amazon pet supplies. Exhibit D-4.

RFA 41. Admit that YOU moved to suspend TTAB Opposition No. 91300524 three days after filing this action, and that the Board suspended the opposition on July 17, 2026.

EXHIBIT BASIS TTABVUE, Opp. 91300524, entries 19 (July 16, 2026, motion to suspend) and 20 (July 17, 2026, suspension), with entry 21 (August 18, 2026) continuing the suspension pending the civil action. Exhibit A-5.

RFA 42. Admit that on June 9, 2026 YOU filed a Notice of Opposition against application Serial No. 99537011 for PETALYX.

EXHIBIT BASIS TTABVUE, Opp. No. 91307984, Ridley USA Inc. v. MSK Future LLC, filed June 9, 2026, pleading the same seventeen registrations. Exhibit A-6.

Use the denials. Requests 1 through 24, 28, 32, 34, 41 and 42 rest on USPTO, TTABVUE and Assignment Center records that Ridley cannot credibly contest; a denial of any of them preserves Rule 37(c)(2) fees if the matter is later proved, and each is a question the corporate witness must then defend under oath. Requests 29, 30, 35, 39 and 40 ask for facts within Ridley's sole knowledge, which is their point: the admission is cheap and the denial is discoverable. Requests 36 through 38 concern third parties and Rule 36(a)(4) permits a lack of knowledge answer after reasonable inquiry; do not threaten fees on those. Draft the deposition outline from the denials, not from the admissions.

3. INTERROGATORIES, SET ONE

Twenty five as a court would count them. Discrete subparts count separately under Rule 33(a)(1), and a set that ignores that loses its last interrogatories to a well founded objection, which are always the ones that matter most. Each interrogatory below therefore asks one question, and where a first instinct produced a compound question, the second half lives in a document request or a deposition topic instead. Where an interrogatory can be answered by producing business records, expect a Rule 33(d) election; Section 4 is drafted so that election gives us the documents anyway. Contention interrogatories (3, 21, 25) routinely draw a prematurity objection this early; serve them now to start the clock, and expect the court to permit supplementation rather than compel early answers.

ROG 1. Identify every product YOU have ever sold, offered for sale, tested, or developed for consumption by a dog or a cat under any mark containing the letters LYX or LIX, and for each state the mark, the dates of sale, and the channels of trade.

EXHIBIT BASIS Pressure point 5. Drafted so that the answer “none” is itself the deliverable. Unit and dollar volumes come through RFP 29 so the identification counts as one interrogatory. Exhibits C-5, C-7.

ROG 2. Identify every occasion on which YOU have advertised, promoted or displayed two or more ASSERTED MARKS together in a single advertisement, brochure, trade show booth, web page or campaign, and for each identify the medium, the date and the audience.

EXHIBIT BASIS Pressure point 7. The central LYX FAMILY proof burden, and it is theirs to carry. Exhibit D-3.

ROG 3. State all facts supporting YOUR contention that consumers recognize the element LYX, standing alone, as an indicator of source.

EXHIBIT BASIS Pressure point 6. Contention interrogatory, facts only; the documents come through RFP 3 and the witnesses through Topic 5, so it counts as one. The family must have been recognized before DWD’s constructive use priority date of August 20, 2024, a date that is itself contingent on registration under Section 7(c). Exhibit A-5.

ROG 4. Identify every consumer survey, focus group, market research study or brand tracking study YOU have commissioned or relied upon that concerns the mark CRYSTALYX, the element LYX, or the LYX FAMILY.

EXHIBIT BASIS Pressure point 6 and 7. Also flushes any survey they intend to use at trial. Pairs with RFA 35.

ROG 5. Identify each instance known to YOU of actual confusion between any product sold under an ASSERTED MARK and any product sold by DWD Ventures LLC, and for each state the date, the person confused, the circumstances, and every document reflecting it.

EXHIBIT BASIS Pressure point 9. The most heavily weighted digit in practice. Expect an empty answer and lock it. Pairs with RFA 39.

ROG 6. Identify every retail store, chain, distributor, marketplace and website through which products bearing an ASSERTED MARK were sold in the last five years.

EXHIBIT BASIS Pressure point 9. Builds the channel separation record against LYX's Amazon, Shopify, Walmart marketplace and Instacart presence. Exhibit D-4.

ROG 7. Identify every advertisement placed for any product bearing an ASSERTED MARK in the last five years in any publication, broadcast, digital platform or event directed to owners of COMPANION ANIMALS.

EXHIBIT BASIS Pressure point 5 and 9. Advertising media identity is a Fifth Circuit digit and the record suggests zero overlap. Exhibit D-4.

ROG 8. Identify every trademark registration or application owned by YOU or by any AFFILIATE containing the letters LYX or LIX that has at any time been cancelled, expired, abandoned or allowed to lapse, and for each state the mark, the registration or serial number, the date, and the reason.

EXHIBIT BASIS Pressure point 1. Fourteen dead registrations and one abandoned application are already documented, seven of them since 2023, nearly all for failure to file a Section 8. No date cutoff, so it reaches the four pre 2015 deaths that sat in predecessor entities. Exhibit C-6.

ROG 9. Identify each person who, at any time since January 1, 2015, has held responsibility for docketing, monitoring or deciding whether to maintain YOUR trademark registrations, and for each state the title and the dates that responsibility was held.

EXHIBIT BASIS Pressure point 1. Produces the maintenance custodians and the Harris foundation WITHOUT naming the three curable registrations; the registration specific status requests are HELD, Section 7 explains why. Exhibit C-5.

ROG 10. State every fact and identify every document concerning YOUR decision to allow Registration No. 2897926 for BUFFER-LYX to be cancelled.

EXHIBIT BASIS Pressure point 2. Paired with ROG 11: the gap between letting it die and filing again six weeks later is the story, asked as two questions so each counts as one. Exhibit C-4.

ROG 11. State every fact concerning YOUR decision to file application Serial No. 99245105 and to seek special handling of it.

EXHIBIT BASIS Pressure point 2. If the stated basis references this dispute or the DWD application, the inference of litigation purpose (confidence MEDIUM) becomes a documented fact. Participants come through Topic 11, not here, so this counts as one. Exhibit C-4.

ROG 12. State every fact concerning the deletion of the goods "pets, and companion animals" from Registration No. 4913250 for GUTCIE in the Section 8 declaration accepted December 2, 2022, including who decided and why.

EXHIBIT BASIS Pressure point 5. The one place pets ever appeared in the portfolio, and Ridley itself deleted them for nonuse in its own maintenance filing. Exhibit C-7.

ROG 13. Identify every agreement, instrument or arrangement under which Alltech, Inc. holds, held, or purported to hold any right, title, interest, license or security interest in any ASSERTED REGISTRATION.

EXHIBIT BASIS Pressure point 4, confidence MEDIUM on the inference. Alltech has never been a record owner yet appears as grantor of security interests twice, at Reel/Frame 6942/0937 and 8750/0513. Exhibit B-3.

ROG 14. Identify every security interest, lien, pledge or other encumbrance currently affecting any ASSERTED REGISTRATION, and for each identify the secured party, the date, the instrument, and whether it has been released.

EXHIBIT BASIS Pressure point 3. Two open liens of record on the sixteen pre 2025 marks and a separate April 2026 lien on BUFFER-LYX. Exhibits B-2 through B-4.

ROG 15. State whether YOU obtained the consent of any secured party to commence or maintain this action, and if so identify the consent and the person who granted it.

EXHIBIT BASIS Pressure point 3. A security interest does not divest a registrant of standing, so this is a burden and leverage question, not a silver bullet; one interrogatory is its correct weight. Exhibits B-2, B-3.

ROG 16. Identify every assignment, license, contribution agreement or other transfer of any ASSERTED REGISTRATION, whether or not recorded at the United States Patent and Trademark Office, from January 1, 2015 to the present.

EXHIBIT BASIS Pressure point 3 and 4. The words “whether or not recorded” are the operative ones: the recorded chain is clean, so any problem lives in an unrecorded document. Exhibit B-1.

ROG 17. For each of Ridley USA Inc., Ridley Block Operations, Ridley U.S. Holdings Inc., Alltech Ridley Inc., Alltech, Inc. and Akralos Animal Nutrition LLC, state the entity's form, its direct parent and ownership percentage, its officers in common with any other listed entity, and which entity employs the persons responsible for marketing the ASSERTED MARKS.

EXHIBIT BASIS Pressure point 4. Itemized so a two sentence answer cannot satisfy it; produces the custodian map for Section 4 and the witness list for Section 6. Exhibit D-3.

ROG 18. Identify each person who has held responsibility for the marketing, brand management or advertising of CRYSTALYX at any time since January 1, 2019, and for each state the title, the dates, and the current employer.

EXHIBIT BASIS Section 6. Produces the deponent list directly and confirms the titles this document deliberately declines to assert from secondary sources. Exhibit F-1.

ROG 19. Identify each person who participated in the decision to file this action.

EXHIBIT BASIS Pressure point 11. Names the decision makers; the identity of participants is not privileged. The TTAB filing decision is covered by Topic 22.

ROG 20. Identify every communication between YOU and any third party, excluding YOUR counsel, concerning DWD Ventures LLC, the mark LYX, or lyxhydration.com, between January 1,

2024 and July 13, 2026, excluding communications protected from discovery by the work product doctrine, and for any communication withheld on that ground provide the information required for a privilege log.

EXHIBIT BASIS Flushes pre suit investigation and any demand to a retailer or platform. The work product carve out and log requirement are on the face so the objection cannot swallow the period. Exhibit A-1.

ROG 21. State all facts supporting YOUR contention that DWD Ventures LLC had knowledge of the ASSERTED REGISTRATIONS prior to its adoption of the mark LYX.

EXHIBIT BASIS The amended TTAB notice pleads only constructive knowledge on information and belief. Intent is a Fifth Circuit digit and this answer will be empty. Contention interrogatory; expect deferral. Exhibit A-5.

ROG 22. Identify every third party use known to YOU of a mark containing the letters LYX or LIX on or in connection with animal products.

EXHIBIT BASIS Pressure point 8. Limited to literal LYX and LIX elements deliberately; a request reaching "lick" in a lick block industry is objectionably overbroad. Enforcement conduct is ROG 23's question, so this counts as one. Exhibits E-1, E-2.

ROG 23. Identify every proceeding, demand letter, cease and desist communication or extension of time to oppose YOU have initiated in the last ten years concerning any mark containing LYX or LIX, and state the outcome of each.

EXHIBIT BASIS Pressure point 11. Documents the extension of time pattern and the near total absence of federal litigation. Exhibit A-6.

ROG 24. State the total revenue, by year for the last five years, derived from products sold under each ASSERTED MARK or product line bearing it.

EXHIBIT BASIS Damages and the fame element they chose not to plead. Framed by mark and product line because companies book revenue by product, not by registration; a registration framing invites a "not maintained in the ordinary course" objection. Pairs with Topic 20.

ROG 25. State all facts supporting YOUR contention that YOU have been damaged by DWD Ventures LLC.

EXHIBIT BASIS Pressure point 11. DWD's application is intent to use with first sales in late 2024. A short window and a startup revenue base make this answer the settlement lever. Methodology comes through the Rule 26(a)(1)(A)(iii) disclosures and expert discovery, not here. Contention interrogatory; expect deferral.

How these count. Rule 33(a)(1) permits 25 including all discrete subparts, and a subpart counts as one only where it is logically or factually subsumed within the primary question. The set is built to that test: ROG 3, 21 and 25 ask facts only, with documents and witnesses routed to RFPs and topics; ROG 10 and 11 separate the lapse from the refiling; ROG 17 is one itemized corporate question; ROG 22 asks knowledge only, with enforcement in ROG 23; ROG 24 asks revenue only, with damages methodology left to the initial disclosures and expert discovery. **If Ridley still counts above 25, seek a stipulation for 35 in the Rule 26(f) report rather than litigating it after service.**

4. REQUESTS FOR PRODUCTION, SET ONE

Rule 34 carries no numeric limit, and Rule 26(d)(2) permits these to be DELIVERED before the Rule 26(f) conference, any time more than 21 days after service of the summons, deemed served at the conference itself. Deliver them early; the thirty day clock then starts the day the parties confer. The default time period is January 1, 2015 to the present, which captures the Alltech acquisition of Ridley; requests outside that default state their period on their face.

A. The family of marks, which they must prove

RFP 1. All documents concerning any advertisement, campaign, brochure, catalog, trade show display or web page in which two or more ASSERTED MARKS appear together.

RFP 2. All marketing plans, brand strategy documents, brand architecture documents and brand guidelines concerning CRYSTALYX or the LYX FAMILY, including documents concerning the naming and brand architecture of Blueprint and Stockade to the extent within YOUR possession, custody or control.

RFP 3. All consumer surveys, focus group materials, market research, brand tracking studies and awareness studies concerning CRYSTALYX, the element LYX, or the LYX FAMILY.

RFP 4. Documents sufficient to show annual advertising expenditure and media placement, by mark and by year, for each ASSERTED MARK.

EXHIBIT BASIS Basis for this group: Exhibits A-5, D-3, D-4. Each request in the group is defensible from those records in one sentence at a hearing.

B. Forty nine years without a pet product. Period: the entire period of YOUR and YOUR predecessors' use of each mark

RFP 5. All documents concerning any product for dogs or cats developed, tested, researched, marketed or sold by YOU under any mark, for the entire period of YOUR corporate existence.

RFP 6. All documents concerning any consideration, proposal, business case or feasibility study regarding entry into the COMPANION ANIMAL market, for the entire period of YOUR corporate existence.

RFP 7. All documents concerning the identification of goods in Registration No. 4913250 for GUTCIE, including the deletion of the goods “pets, and companion animals” in the Section 8 declaration accepted December 2, 2022.

RFP 8. All documents concerning any sale of any product bearing an ASSERTED MARK through a pet specialty retailer, a pet category of a general retailer, or a pet focused online storefront, for the entire period of use of each mark.

EXHIBIT BASIS Basis for this group: Exhibits C-5, C-7. Each request in the group is defensible from those records in one sentence at a hearing.

C. Chain of title, encumbrance and the unrecorded layer

RFP 9. All assignments, licenses, contribution agreements, and transfers of any ASSERTED REGISTRATION, whether or not recorded.

RFP 10. The trademark security agreements and collateral schedules underlying the instruments recorded at Reel/Frame 7516/0491, 8750/0513 and 9248/0442, insofar as they identify or encumber any ASSERTED REGISTRATION, together with any consent, waiver or authorization from a secured party concerning the commencement or maintenance of this action.

RFP 11. All documents evidencing the release or discharge of any security interest in any ASSERTED REGISTRATION.

RFP 12. All documents concerning the basis on which Alltech, Inc. granted or purported to grant a security interest in registrations owned of record by Ridley USA Inc.

RFP 13. All documents concerning the Akralos Animal Nutrition transaction insofar as they concern the allocation, retention or exclusion of any mark containing LYX or LIX, including all drafts of Schedule A to the instrument recorded at Reel/Frame 9154/0662 exchanged between the parties to that transaction.

EXHIBIT BASIS Drafts EXCHANGED between Ridley and Akralos are discoverable; internal drafts circulated with counsel are privilege log material. Brief the exchanged drafts theory before the fight, not during it. Basis: Exhibits B-1 through B-9.

EXHIBIT BASIS Basis for the group's remaining requests: Exhibits B-1 through B-9.

D. The maintenance record. Period: January 1, 2005 to the present, stated on the face of each request

RFP 14. All documents from January 1, 2005 to the present concerning the docketing, monitoring and maintenance of YOUR trademark registrations, including docketing system records and any policy or procedure, excluding communications protected by the attorney client privilege.

RFP 15. All documents from January 1, 2005 to the present concerning the cancellation, expiration, abandonment or lapse of any mark containing LYX or LIX.

RFP 16. All documents concerning the cancellation of Registration No. 2897926 for BUFFER-LYX and the filing of application Serial No. 99245105.

RFP 17. All documents concerning the request for special handling of application Serial No. 99245105.

EXHIBIT BASIS Basis for this group: Exhibits C-4, C-6. Each request in the group is defensible from those records in one sentence at a hearing.

E. The crowded field. Period: the entire period of YOUR awareness of each third party mark

RFP 18. All documents concerning Lixit Corporation, Miller Manufacturing Company, or any product bearing the mark LIXIT.

RFP 19. All documents concerning Carrs Agriculture Limited, Fevara (UK) Limited, or any product bearing the mark HORSLYX or PIGLYX.

RFP 20. All documents concerning any third party use of a mark containing the letters LYX or LIX on animal products.

RFP 21. All watch service reports, clearance searches and monitoring reports covering marks containing LYX or LIX, excluding clearance opinions and other documents protected by the attorney client privilege, and for any document withheld provide the information required for a privilege log.

RFP 22. All documents concerning any decision not to take enforcement action against any third party mark containing LYX or LIX, excluding documents protected by the attorney client privilege or the work product doctrine.

RFP 23. Non privileged documents concerning TTAB Opposition No. 91307984 against PETALYX, limited to the public record of that proceeding and communications with third parties concerning it.

EXHIBIT BASIS Basis for this group: Exhibits E-1, E-2. Each request in the group is defensible from those records in one sentence at a hearing.

F. This dispute and the escalation

RFP 24. All documents concerning DWD Ventures LLC, Dylan Jones, LYX Hydration, or lyxhydration.com, created before July 13, 2026, excluding documents protected by the attorney client privilege or the work product doctrine.

RFP 25. Documents sufficient to show who authorized the filing of this action and when, excluding documents protected by the attorney client privilege or the work product doctrine.

RFP 26. Documents sufficient to show who authorized the motion to suspend TTAB Opposition No. 91300524 and when, excluding documents protected by the attorney client privilege or the work product doctrine.

RFP 27. All documents concerning any actual or suspected confusion between any product of YOURS and any product of DWD Ventures LLC.

RFP 28. All documents concerning any communication with Amazon, Walmart, Instacart, Shopify or any other marketplace concerning DWD Ventures LLC or the mark LYX.

EXHIBIT BASIS Basis for this group: Exhibits A-1 through A-6. Each request in the group is defensible from those records in one sentence at a hearing.

G. Damages, revenue and the injunction they seek

RFP 29. Documents sufficient to show annual revenue and unit volume, by mark or product line, for each ASSERTED MARK for each of the last five years, including any revenue derived from purchasers of COMPANION ANIMAL products.

RFP 30. All documents concerning any harm YOU contend YOU have suffered as a result of DWD's use of the mark LYX.

RFP 31. All documents concerning the value, goodwill or strength of the mark CRYSTALYX among purchasers of COMPANION ANIMAL products or in COMPANION ANIMAL retail channels.

EXHIBIT BASIS Basis for this group: Pressure points 9 and 11. Each request in the group is defensible from those records in one sentence at a hearing.

Thirty one requests. The prior draft's demands for full credit agreements, all advertising invoices, the litigation budget, and all documents concerning a pending TTAB proceeding were cut or narrowed: each was the likeliest source of a sustained objection, and the narrowed forms above reach the same facts. The registration specific maintenance status request is HELD with its companions; Section 7 explains why.

One request does most of the work. RFP 13, the exchanged drafts of Schedule A to the Akralos assignment, is the highest value document request in this set. The recorded instrument contains no carve out clause, no retained marks clause and no license back; the LYX family was kept by simple omission from a schedule. Whatever governed that omission lives in an unrecorded document, and that document will also describe what Ridley believes it owns and what it believes it is worth.

5. RULE 30(B)(6) DEPOSITION TOPICS, RIDLEY USA INC.

Rule 30(b)(6) as amended in 2020 requires a good faith conference about the matters for examination. These are drafted with the particularity the rule demands so that a designee cannot be produced unprepared and a topic cannot be dodged as vague. Serve after the responses to Sections 2 through 4 are in hand, so that every denial and every non answer is a topic the corporation must prepare a witness to address. Topics 5 and 20 are contention topics; some courts limit 30(b)(6) contention examination, and they are the two to trade at the conference if something must be traded.

TOPIC 1. The identification of goods in each ASSERTED REGISTRATION, and the products actually sold under each ASSERTED MARK.

EXHIBIT BASIS Exhibit C-5

TOPIC 2. Every product offered at any time, by YOU or any AFFILIATE, under any mark containing the letters LYX or LIX, for any COMPANION ANIMAL.

EXHIBIT BASIS Exhibits C-5, C-7. Limited to LYX and LIX marks deliberately: Alltech HAS a pet ingredient business under other marks, and an unlimited topic would prove the corporate family serves pet markets, which is Ridley's zone of expansion evidence, not ours.

TOPIC 3. The deletion of the goods "pets, and companion animals" from Registration No. 4913250 for GUTCIE in the Section 8 declaration accepted December 2, 2022.

EXHIBIT BASIS Exhibit C-7

TOPIC 4. The manner in which the ASSERTED MARKS are advertised, including any advertisement in which two or more appear together.

EXHIBIT BASIS Exhibits D-3, D-4

TOPIC 5. The factual basis for the contention that consumers recognize the element LYX standing alone as an indicator of source.

EXHIBIT BASIS Exhibit A-5. Contention topic; hold loosely.

TOPIC 6. All consumer surveys and market research concerning CRYSTALYX, the element LYX, or the LYX FAMILY.

EXHIBIT BASIS Pairs with RFA 35 and RFP 3.

TOPIC 7. The channels of trade, retail outlets and online marketplaces through which products bearing the ASSERTED MARKS are sold.

EXHIBIT BASIS Exhibit D-4

TOPIC 8. Every instance of actual confusion known to Ridley between any of its products and any product of DWD Ventures LLC.

EXHIBIT BASIS Pairs with RFA 39 and ROG 5.

TOPIC 9. The docketing, monitoring and maintenance of YOUR trademark registrations since January 1, 2005, including the systems, personnel and procedures used.

EXHIBIT BASIS Exhibits C-4, C-6

TOPIC 10. The cancellation, expiration, abandonment or lapse of each mark containing LYX or LIX at any time, and the reasons.

EXHIBIT BASIS Exhibit C-6. No date cutoff; the pre 2015 deaths are inside it.

TOPIC 11. The cancellation of Registration No. 2897926, and the filing, special handling and registration of application Serial No. 99245105, including every person who participated in those decisions.

EXHIBIT BASIS Exhibit C-4

TOPIC 12. The ownership of each ASSERTED REGISTRATION, including every assignment, license and transfer, whether or not recorded.

EXHIBIT BASIS Exhibits B-1, B-6 through B-9

TOPIC 13. Every security interest, lien or encumbrance affecting any ASSERTED REGISTRATION.

EXHIBIT BASIS Exhibits B-2 through B-4. Consent to sue is ROG 15's question; the topic stays single subject.

TOPIC 14. The basis on which Alltech, Inc. granted or purported to grant a security interest in registrations owned of record by Ridley USA Inc.

EXHIBIT BASIS Exhibit B-3. Expect "not within the noticed party's knowledge"; if the answer matters, the instrument goes to Alltech under Rule 45.

TOPIC 15. The Akralos Animal Nutrition transaction insofar as it concerns the allocation, retention or exclusion of any mark containing LYX or LIX, including the preparation of Schedule A to the instrument recorded at Reel/Frame 9154/0662.

EXHIBIT BASIS Exhibit B-1

TOPIC 16. The corporate relationship among Ridley USA Inc., Ridley Block Operations, Ridley U.S. Holdings Inc., Alltech Ridley Inc., Alltech, Inc. and Akralos Animal Nutrition LLC, and which entity employs the persons responsible for the ASSERTED MARKS.

EXHIBIT BASIS Exhibit D-3; pairs with ROG 17.

TOPIC 17. Ridley's knowledge of third party use of marks containing the letters LYX or LIX on animal products, including the marks LIXIT and HORSLYX, and any decision whether to take enforcement action.

EXHIBIT BASIS Exhibits E-1, E-2

TOPIC 18. Ridley's enforcement history concerning marks containing LYX or LIX over the last ten years, including every extension of time, opposition, cancellation, demand and civil action, and the outcome of each.

EXHIBIT BASIS Exhibit A-6; pairs with ROG 23.

TOPIC 19. The facts supporting Ridley's contention that DWD Ventures LLC had knowledge of the ASSERTED REGISTRATIONS before adopting the mark LYX.

EXHIBIT BASIS Exhibit A-5. Contention topic; hold loosely.

TOPIC 20. Revenue, unit volume and advertising expenditure, by mark or product line, for each ASSERTED MARK for the last five years.

EXHIBIT BASIS Pairs with ROG 24 and RFP 29.

TOPIC 21. The facts of any harm Ridley contends it has suffered as a result of DWD's use of the mark LYX.

EXHIBIT BASIS Damages methodology is expert territory under Rule 26(a)(2); this topic stays on facts.

TOPIC 22. The date on which, and the persons by whom, the decisions to file this action, to file TTAB Opposition No. 91300524, and to move to suspend that opposition were authorized, exclusive of communications protected by the attorney client privilege or the work product doctrine.

EXHIBIT BASIS Narrowed to who and when on its face; the substance of legal advice is not asked. Pairs with ROG 19 and RFP 25, 26.

Twenty two topics. The registration specific maintenance status topic is HELD with its written discovery companions; Section 7 explains why.

Topic 22 is drafted with the privilege carve out on its face. That is deliberate. It removes the easiest objection, and it still reaches the business decision makers, the timing, and who authorized what. Facts about when and by whom a decision was made are not privileged merely because counsel was in the room.

6. THE ORG CHART AND THE DEPOSITION MAP

This is the second half of the assignment: putting names on the record now so that the deposition phase opens with a list rather than a research project. Every person below is identified from a public source, with that source named. Titles carry the date of the source that stated them, because a title stated without its date is a title that will be wrong by the time the notice issues. Where a role is self reported rather than company confirmed, it is labeled.

Two disciplines before any notice issues. First, confirm current employment through Interrogatory 18 and Topic 17 rather than relying on a website: this is a company that restructured its United States leadership on August 11, 2026. Second, do not compile anything about these individuals beyond their professional role and their public professional statements. Everything in this section came from company pages, press releases, USPTO filings and trade press. Third: **Rule 30(a)(2)(A)(i) allows ten depositions per side without leave, and Rule 30(d)(1) caps each at seven hours.** Tier one plus the Rule 30(b)(6) is five; choose at most five more, or stipulate in the Rule 26(f) report. Fourth: **most of these witnesses are NOT the party.** Harris, Steve Elliott, Susanna Elliott and Timmons are Alltech Inc. personnel; Alltech is not a party, so they come by Rule 45 subpoena within 100 miles of where they work in Kentucky, not by notice in Fort Worth. Castle is noticeable only because he is also President of Ridley USA Inc. And Castle, Susanna Elliott and Timmons are apex officers of the parent: expect apex doctrine motions requiring exhaustion of less intrusive means, which is exactly what taking the 30(b)(6) first builds.

Tier one: the four depositions that decide the case

Witness	Role and entity	What only this witness can lock	Set up by
E. Michael Castle II	Chief Operations and Financial Officer, Alltech Inc. (alltech.com leadership page, August 27, 2026), and President, Ridley USA Inc. , a title the Alltech page does not carry and that rests on his own signature block at Reel/Frame 9154/0662.	Ownership and chain of title. What moved to Akralos and what stayed, and why the entire LYX family was left off Schedule A. Whether any unrecorded transfer or license exists. The basis on which Alltech encumbered marks it does not own. He is the natural corporate designee on Topics 12 through 16.	RFA 17 to 24; ROG 13 to 17; RFP 9 to 13

Witness	Role and entity	What only this witness can lock	Set up by
Charles Bradford "Brad" Harris	Chief Legal Officer, Alltech Inc. (alltech.com leadership page, August 27, 2026). Attorney of record and correspondent on the Ridley portfolio, confirmed on all three CRYSTALYX registrations from TSDR directly; the 157 mark count is from a secondary index and is not filing grade.	Prosecution decisions, the goods recitations, the GUTCIE deletion of pet and companion animal goods, the docketing failure behind fifteen dead marks, the BUFFER-LYX lapse , and the clearance and enforcement practice. Note he is NOT attorney of record on the refiling: Caitlin R. Byczko of Barnes & Thornburg is, per TSDR for Ser. 99245105. Ask him about the lapse, not the refiling.	RFA 1 to 16, 28; ROG 8 to 12; RFP 14 to 17
Alex Morcom	Head of Marketing, Ridley Block Operations and prior Crystalyx Brand Manager , both per a public self reported professional profile (August 27, 2026); no company page currently confirms either title, so confirm through ROG 18 before any notice issues.	Whether a LYX family is marketed as a family at all, the channels, the media plan, the trade shows, and whether the companion animal category was ever considered. The single best witness on pressure point 7.	RFA 31 to 35; ROG 2, 4, 6, 7, 18; RFP 1 to 4
Steve Elliott	Global Vice President, Corporate Accounts and Pet , Alltech Inc. (alltech.com leadership page, August 27, 2026). The only named executive in the group with pet in the title. Non party; Rule 45.	The clean answer to the only question that matters on the zone of expansion: has any LYX or LIX product ever been considered, tested or sold for dogs or cats. A short deposition with one very good answer.	RFA 25 to 30; ROG 1; RFP 5 to 8

Tier two: the corroborating witnesses

Witness	Role and entity, with the date of the source	Why they matter
Kevin Levi	President, Ridley Block Operations and EVP of Ridley Inc. (alltech.com leadership page, August 27, 2026; quoted in that role in the July 16, 2026 Kropp release).	Business scope, customers, channels, and the four brand architecture that undercuts the family theory.

Witness	Role and entity, with the date of the source	Why they matter
Mark Robbins	Long tenured CRYSTALYX technical voice, described in brand materials as having 25 plus years with the brand; narrated the brand history episode of December 12, 2023. His exact current title is NOT company confirmed (sources vary between Research and Technical Services and Research and Nutrition Services); state none until ROG 18 answers.	The brand's own institutional history, in the brand's own words, including what CRYSTALYX has and has not ever been.
Neil Bumgarner	Director of Sales, RBO per secondary directories (August 27, 2026); no company page currently confirms the title. Confirm through ROG 18.	Channel separation and the absence of any actual confusion reaching the sales organization.
Susanna Elliott	Leads Alltech's global marketing team per her Alltech page (August 27, 2026); the CMO title appears only in secondary sources. Non party, apex; Rule 45.	Advertising approvals and whether any cross brand family campaign was ever run or proposed.
Becky Timmons	Chief Product Officer, Alltech Inc. (alltech.com leadership page, August 27, 2026). Non party, apex; Rule 45.	Product and portfolio definition: what goods a brand does and does not cover.
Laurentia van Rensburg	General Manager, U.S. Beef as of August 11, 2026. In May 2022 she presented on senior pet nutrition at Alltech ONE as technical mineral manager.	The one person publicly documented on both the pet side and the beef side. Whether that means anything here is UNKNOWN and is a question, not a theory. Confirm the current title through ROG 18 before noticing.
Paul Kropp	Executive Vice President, RBO, joined July 16, 2026.	A brand new custodian with a small, clean document set, hired for revenue expansion and strategic partnerships. Useful precisely because he has no history to defend.

Tier three: the brand's own public voices, as documents rather than depositions

These people speak for CRYSTALYX in public, on the company's own podcast and in trade materials. Their published statements may be non hearsay under Rule 801(d)(2)(D), but only if the agency foundation is actually laid, and there is a wrinkle: they are identified with **Ridley Block Operations**, while the party is **Ridley USA Inc.** This document elsewhere makes that separateness a centerpiece, so it cannot be assumed away here. Establish the employment link through ROG 17

and 18 first. **Do not notice these as depositions.** With a ten deposition cap, seven witnesses to confirm an uncontested point is the textbook proportionality objection. Use the published statements as documents. Titles are given only where a title was actually published; where none was published, none is stated, and counsel should not plead one.

Name	Published description	Where
Jill Peine	Ridley Block nutritionist	Brand podcast, September 25, 2023
Ryan Bapst	Account Manager, Ridley Block Operations	Brand podcast, July 2023; co-op webinar promotion
Reed Van Driesten	Account manager, Canadian market	Brand podcast, September 2023 and November 2022
Jon Albro	Described as having 25 plus years working with CRYSTALYX. No title published.	Brand podcast, 2023 episodes
Brayden Hawkins	Brand spokesperson on mineral needs and reproductive efficiency. No title published.	Brand podcast, March 2024, October and May 2023
Harrison Smith	Brand spokesperson; presented the Body Condition Score app. No title published.	Brand podcast, March 2024 and June 2023
Tim Clark	"Tim Clark of Ridley Block Operations." No title published.	Brand podcast index

Third parties: subpoenas under Rule 45

Target	What to seek	Why
Akralos Animal Nutrition LLC (Brian Gier, CEO; Brad Dalke, COO, per akralos.com, August 27, 2026; its recorded address is 3031 Catnip Hill Road, Nicholasville, KY, which is Alltech's own headquarters)	All drafts of and communications concerning Schedule A to the instrument recorded at Reel/Frame 9154/0662, and all documents concerning the allocation of any mark containing LYX or LIX.	The instrument is theirs as much as Ridley's, and the omission of the LYX family from a sixty nine mark schedule was a decision someone documented.
Bank of America, N.A. and Wilmington Trust, N.A. , as Administrative Agents. CONDITIONAL: serve only if Ridley's answers to ROG 14 and 15 or RFP 10 leave the encumbrance record incomplete	The trademark security agreements and collateral schedules insofar as they identify any ASSERTED REGISTRATION, and any consent, waiver or standing authorization concerning enforcement litigation.	A security interest does not divest a registrant of standing, so the lien theory is leverage and burden, not a dispositive defense. Subpoenas to two national banks are the likeliest source of a motion to quash in this case; take them only if the party discovery leaves a gap worth the fight, and negotiate a protective order in advance.

Target	What to seek	Why
Barnes & Thornburg LLP (Cislak, Byczko, Lisch)	The transactional file for the Ridley to Akralos assignment only, expressly excluding any document concerning this litigation.	Barnes & Thornburg is Ridley's counsel of record in this action and in both TTAB oppositions. A Rule 45 subpoena to the adversary's own counsel is a serious step. Narrowly drawn to the transactional role, on which Rocky Cislak was the correspondent of record for the recordation, so that the privilege fight is at least winnable. Treat as optional and take it last, if at all.
Miller Manufacturing Company (current owner of Reg. 1839458 per an assignment update of May 27, 2026), and Lixit Corporation as original registrant	Documents sufficient to show the duration, volume and retail channels of its United States sales of drinking devices for dogs, and any communication with Ridley or Alltech.	Turns the crowded field from an argument into evidence. A friendly, narrow subpoena; consider a stipulation instead.

A caution on the Harris deposition. Brad Harris is a lawyer, and although he is not trial counsel in this action, expect a motion for protective order and be ready to brief the Shelton factors. **Shelton v. American Motors is an Eighth Circuit decision, not binding here, though N.D. Tex. courts frequently apply it; brief it alongside the Fifth Circuit's treatment.** The route through is that he is a **fact witness on prosecution**: what goods were recited, when a maintenance filing was or was not made, and why a recitation was amended are historical facts, not legal advice. Notice him on those facts specifically, not as counsel, and consider taking the corporate designee on Topics 9 through 12 first so that the necessity is demonstrated on the record before his notice issues.

7. SEQUENCING, THE HELD RESERVE, AND WHERE THE TRAPS CLOSE

The order matters more than the content. Discovery in this case is a sequence of doors that close behind Ridley, and two of the doors must not be pointed at before they can be shut.

The held reserve, deliberately unserved

Four requests are drafted and HELD: the STABLE-LYX maintenance status admission, the registration specific maintenance interrogatory, the Section 8 status document request, and the matching 30(b)(6) topic. The reason is the grace period. STABLE-LYX’s Section 8 window runs to March 2, 2027, and IONO-LYX and POWER-LYX to late July 2027; a wave one request naming those registrations is a docketing memo delivered to Barnes & Thornburg while every one of them is still curable. Ridley files the declarations, truthfully denies, and the most time sensitive asset in the case evaporates. The fourteen already dead registrations carry the maintenance narrative without warning anyone. Serve the held set only after March 2, 2027, and only as to registrations then actually lapsed. Diary September 3, 2026, January 28 and 30, 2027, and March 3, 2027, and re-pull TSDR on each date.

Stage	Move	What it forecloses
Zero	Read the operative pleadings and hold the Rule 26(f) conference. Pull Doc. 1 (the complaint and its asserted registrations), Doc. 15 (DWD’s own ANSWER AND COUNTERCLAIM, filed August 19, 2026), and the docket sheet, which also settles the judge and Doc. 11. Reconcile every ASSERTED REGISTRATIONS predicate and every contention request to what the pleadings actually say, and map the requests to the counterclaim’s elements, whose burdens are DWD’s to carry. At the conference: stipulate 35 interrogatories, address the deposition count, and raise the protective order for financial material.	Serving discovery calibrated to the TTAB record instead of the federal pleadings; discovering mid deposition that the counterclaim’s burdens were never assigned a request.

Stage	Move	What it forecloses
Zero point five	Deliver the document requests early under Rule 26(d)(2) , any time 21 days after service of the summons, deemed served at the conference.	A month of dead time on the document dependent theories. Rule 26(d)(1) bars serving everything else before the conference; delivery under 26(d)(2) is the one lawful head start.
One	At the conference or immediately after, serve the requests for admission and the interrogatories together.	Ridley must either admit facts on the face of USPTO records or deny them in writing. Either outcome is usable and neither is free.
Two	Move under Rule 36(a)(6) to determine the sufficiency of any evasive or objection riddled answer to the registry backed admissions (RFA 1 to 24, 28, 32, 34, 41, 42). Certificate of conference and proposed order attached. Preserve Rule 37(c)(2) fees for proof at trial rather than asserting them now.	Tests the form of the answer, which is what Rule 36 actually allows, and demonstrates to chambers who is being reasonable. There is no motion to compel an admission.
Three	Take the Rule 30(b)(6) on Topics 9 through 16 first, before any individual notice.	Locks the corporation on ownership, encumbrance and maintenance before any individual can be coached around it, builds the apex exhaustion record for the parent's officers, and builds the necessity record for the Harris notice.
Four	Then Castle by notice (he is an officer of the party), then Morcom, then Steve Elliott by Rule 45 in Kentucky. Harris last, under Rule 45, after the necessity record exists, briefed on the Shelton factors as N.D. Tex. courts apply them and on the Fifth Circuit's treatment in <i>Nguyen v. Excel Corp.</i> , 197 F.3d 200 (5th Cir. 1999), which cabins Shelton to counsel's role in the pending litigation and therefore HELPS a notice aimed at prosecution history.	Each deposition is taken with the prior transcript in hand. Elliott's answer on pet products is the one that should close the zone of expansion for good.
Five	Serve the Akralos subpoena in parallel with stage three. Hold the lender subpoenas unless the party discovery leaves the encumbrance record incomplete.	The Schedule A drafts should be in hand before Castle sits; the bank fight is taken only if it is worth having.

Stage	Move	What it forecloses
Six	After March 2, 2027: serve the held reserve as to any registration then actually lapsed.	The lapse becomes an admitted, dated fact instead of a cured warning shot.
Seven	Open settlement only after the maintenance record and the encumbrance record are both complete.	The August 7 dossier's endgame analysis holds: a fenced coexistence agreement is the rational outcome, and it is worth more the day after Ridley has explained fourteen dead registrations under oath.

8. EXHIBIT INDEX

Every citable record relied on in this document, in the form counsel needs to pull it, mark it and attach it. Grade PRIMARY means the record itself. Grade SECONDARY means a mirror that must be replaced with a certified copy before it goes into a filing. All records were pulled August 27, 2026 unless otherwise stated.

Designations used in the basis lines

Label	Record it stands for	Where pulled
A-1 to A-10	The case, the parties and the prior proceedings, itemized below	PACER / CourtListener / TTABVUE
B-1 to B-9	Chain of title and encumbrance instruments, itemized below	USPTO Assignment Center, instruments opened
C-4	The BUFFER-LYX file histories: cancelled Ser. 76523375 and refiled Ser. 99245105 / Reg. 7985825	tsdr.uspto.gov/statusview, August 27, 2026
C-5	TSDR status views for all seventeen LYX family registrations, the table at C below	tsdr.uspto.gov/statusview, August 27, 2026
C-6	TSDR status views for the fourteen dead registrations and the abandoned EQUI-LYX application, the table at D below	tsdr.uspto.gov/statusview, August 27, 2026
C-7	GUTCIE, Ser. 86710749 / Reg. 4913250: bracketed deleted goods and the partial Section 8 acceptance of December 2, 2022	tsdr.uspto.gov/statusview/sn86710749
C-8	SWEETLIX Regs. 762839, 935259 and 7421945, all live, all Ridley USA Inc.	tsdr.uspto.gov/statusview, August 27, 2026
D-3	Alltech's Ridley Block Operations page naming the four brands, and crystalyx.com's terms of use identifying "Ridley USA Inc. d/b/a Ridley Block Operations"	alltech.com/our-companies/ridley-block-operations; crystalyx.com/terms-of-service
D-4	The four separate brand websites and the retail channel captures	crystalyx.com, sweetlix.com, blueprintanimalnutrition.com, stockadebrands.com; Walmart, Chewy, Amazon, Tractor Supply listings, August 27, 2026
E-1	LIXIT: Reg. 1839458 (first use 1954), predecessor Reg. 0954296, the Miller Manufacturing assignment at Reel/Frame 9204/0597, retail listings	TSDR and Assignment Center, August 27, 2026

Label	Record it stands for	Where pulled
E-2	HORSLYX and PIGLYX: Reg. 2922064 (live, Fevara (UK) Limited, renewed June 18, 2024); Regs. 4915432 and 4915863 (cancelled September 23, 2022, Section 8); PIGLYX Ser. 86367721 (abandoned 2018)	TSDR, August 27, 2026
F-1	The org chart source set: Alltech leadership pages, the July 16 and August 11, 2026 press releases, akralos.com, the Beyond the Barrel podcast index	Itemized in the table at F below, each row dated

A. The case, the parties and the prior proceeding

Ex.	Record	Locator	Grade
A-1	Complaint with jury demand, Exhibits A through I, and civil cover sheet	N.D. Tex. No. 4:26-cv-00854, Doc. 1, filed July 13, 2026; PACER case ID 423080; CourtListener docket 73608313	PRIMARY
A-2	Certificate of Interested Persons / Disclosure Statement	Doc. 6, July 13, 2026, with the clerk noted affiliate entry	PRIMARY
A-3	Order granting extension in part; response deadline August 19, 2026	Doc. 14, August 4, 2026	PRIMARY
A-4	Order unfiling pleading. The docket text is "Order Unfiling Pleading," not an order striking. N.D. Tex. LR 7.1(c) is confirmed as the proposed order rule.	Doc. 12, July 30, 2026. The characterization that Doc. 11 was struck in one day is UNVERIFIED; Doc. 11's own date is not in the record we hold.	PRIMARY, characterization unverified

Ex.	Record	Locator	Grade
A-5	TTAB Opposition, Ridley USA Inc. v. DWD Ventures LLC	TTABVUE Opp. No. 91300524, filed July 23, 2025; amended notice entry 11, November 25, 2025 (Paragraph 6 chart pleads seventeen registrations including BUFFER-LYX 7985825; TTABVUE's summary panel is stale at sixteen); Board order entry 17, March 13, 2026, reciting the oral grant of leave to amend; suspension entries 19 and 20, July 16 and 17, 2026, and entry 21, August 18, 2026, suspension pending disposition of the civil action	PRIMARY
A-6	TTAB Opposition against PETALYX	TTABVUE Opp. No. 91307984, filed June 9, 2026, v. MSK Future LLC, Ser. 99537011	PRIMARY
A-7	Ragland Mills, Inc. v. Ridley USA Inc., dismissal	W.D. Mo. No. 3:18-cv-05030 (CourtListener docket 7242799), filed April 5, 2018; voluntary dismissal notice August 10, 2018 (entry 8); Order of Dismissal with prejudice , each party bearing its own costs, expenses and attorneys' fees, entered August 14, 2018 by Judge M. Douglas Harpool (entry 9). No answer on the docket.	PRIMARY
A-8	DWD application for LYX	Ser. No. 98707152, filed August 20, 2024, Class 31, "Beverages for canines; Electrolyte drink mix for pets"	PRIMARY
A-9	ANSWER TO COMPLAINT AND COUNTERCLAIM	Doc. 15, August 19, 2026, per the RECAP record. DWD answered and counterclaimed on the deadline; the default risk that organized the August 7 dossier is closed.	PRIMARY metadata; pull the document

Ex.	Record	Locator	Grade
A-10	Order for scheduling order proposal	Doc. 17, August 19, 2026. The Rule 26(f) clock is running; Stage Zero of Section 7 is live now.	PRIMARY metadata; pull the document

B. Chain of title and encumbrance, USPTO Assignment Center

Ex.	Instrument	Reel/Frame and date	Note
B-1	Assignment of Trademarks, Ridley USA Inc. to Akralos Animal Nutrition LLC, 69 marks, 10 pages	9154/0662 , effective February 1, 2026 per the recital and cover sheet, recorded February 3, 2026	All 69 Schedule A properties enumerated; none contains LYX or LIX. Signed by E. Michael Castle, II, President. The instrument's own execution date blanks are unfilled and there is no assignee signature block; the February 1 date is the recital's.
B-2	Trademark security agreement, Ridley USA Inc. to Bank of America, N.A. as Administrative Agent, 215 properties	7516/0491 , executed October 15, 2021, recorded December 1, 2021	No release of record. Covers 16 of the 17 pleaded registrations.
B-3	Second lien trademark security agreement, Alltech, Inc. to Wilmington Trust, N.A. as Administrative Agent, 286 properties	8750/0513 , executed November 13, 2024, recorded November 14, 2024	No release of record. Grantor has never been a record owner of these marks.
B-4	Trademark security agreement, Ridley USA Inc. to Bank of America, N.A., 4 properties including BUFFER-LYX	9248/0442 , executed April 24, 2026, recorded April 27, 2026	Granted April 24, 2026, which is BEFORE this action was filed on July 13, 2026 and after the TTAB opposition was filed. Do not describe it as granted during this litigation.
B-5	Trademark security agreement, Alltech, Inc. to Wilmington Trust, 315 properties, and its partial release	6942/0937 (May 20, 2020) and 7597/0748 (January 31, 2022)	Released as to all sixteen. Correspondent field names Schulte Roth & Zabel; the secured party is Wilmington Trust. Do not plead the firm as a lienholder.
B-6	Ridley Block Operations, Inc. to Ridley USA Inc.	5825/0875, executed June 8, 2016	The conveyance that put thirteen of the pleaded marks in the plaintiff's name.

Ex.	Instrument	Reel/Frame and date	Note
B-7	4 Seasons Marketing, LLC to Ridley U.S. Holdings Inc. (ULTRALYX), then to Ridley USA Inc.	3737/0978 (2008) and 5824/0862 (2016)	A separate entry path worth confirming at deposition.
B-8	SWEETLIX, LLC to Ridley U.S. Holdings, Inc. (BOVALYX)	2908/0679, executed July 30, 2004	A later recorded security interest states an execution date of October 16, 2001, before the grantor owned the mark. Historical, released at 3958/0368.
B-9	Pfizer Inc. to McKenzie International Corporation , then McKenzie International Organization to Hubbard Milling	415/0410 (1982) and 456/0075 (1984)	Name discontinuity with no intervening name change document of record, in the CRYSTALYX Reg. 1089036 chain.

The release trap, defused in advance. Every one of the sixteen serials was checked against the full property schedules of both liens: all sixteen appear on the 215 property schedule of 7516/0491 AND the 286 property schedule of 8750/0513, and BUFFER-LYX appears only on 9248/0442. The abstracts DO carry later release instruments, and an opponent skimming them will wave those around. The documents themselves defeat the move: 7512/0838 (November 30, 2021) terminates only the 2017 lien at 6006/0619 and its Section 5 EXPRESSLY preserves the October 15, 2021 pledge that became 7516/0491; and 7597/0748 (January 31, 2022) releases only the May 2020 Wilmington recordings at 6942/0937 and 7230/0450. Neither touches the two open liens. Cite both releases by reel and frame before Ridley does.

C. The pleaded registrations: status, goods and the maintenance clock

All seventeen marks in the LYX family are live, on the Principal Register, in International Class 5, and stand in the name of Ridley USA Inc. All seventeen are pleaded in the amended notice in the DWD opposition and in the PETALYX opposition; the federal complaint own asserted list is confirmed against Doc. 1 before service. Verify each at tsdr.uspto.gov/statusview/sn plus the serial number.

Mark	Reg. / Ser.	Goods as registered	Next §8/§9
CRYSTALYX	1089036 / 73133190	MINERAL PROTEIN SUPPLEMENT FOR CATTLE	April 11, 2028
CRYSTALYX	3015473 / 78482287	Mineral Protein Supplement for Livestock Animals	November 15, 2035
CRYSTALYX VP	3008011 / 78425372	Feed Supplements for Livestock	October 18, 2035

Mark	Reg. / Ser.	Goods as registered	Next §8/§9
BEEF-LYX	1894794 / 74497702	feed supplement for livestock animals	May 23, 2035
DAIRY-LYX	1895832 / 74497580	feed supplement for livestock animals	May 30, 2035
PHOS-LYX	2434182 / 75711267	Mineral Protein Supplements for Cattle	March 6, 2031
FORAGE-LYX	3399143 / 77080205	Animal Feed Supplements	March 18, 2028
POWER-LYX	3204575 / 78635435	Feed Supplements for Livestock	January 30, 2027, nothing filed
GOAT-LYX	2757363 / 76416711	Feed Supplement For Livestock	August 26, 2033
ULTRALYX	3409074 / 78795995	Animal feed supplements	April 8, 2028
IONO-LYX	2034426 / 74675033	feed supplement for livestock animals	January 28, 2027, nothing filed
BOVALYX	2680948 / 76404564	ANIMAL FEED SUPPLEMENTS	January 28, 2033
FESCUE-LYX	1691139 / 74149972	feed supplement for livestock animals	June 9, 2032
META-BOLYX	3314244 / 78793232	Animal feed supplements	October 16, 2027
NATURALYX	2506579 / 76177333	Mineral Protein Supplement For Cattle	November 13, 2031
STABLE-LYX	1407344 / 73581987	DIETARY FEED SUPPLEMENT FOR HORSES	SEPTEMBER 2, 2026, nothing filed
BUFFER-LYX	7985825 / 99245105	Feed Supplements For Livestock	First window 2030. Not incontestable.

D. The fourteen dead registrations and one abandoned application

Mark	Reg. / Ser.	Died	Reason
AGRILYX	5662231 / 87447609	August 1, 2025	No acceptable Section 8
BUFFER-LYX (original)	2897926 / 76523375	May 9, 2025	No acceptable Section 8
ROLYX	2813675 / 76356392	August 23, 2024	No acceptable Section 8
SEED-LYX	2757351 / 76410590	March 8, 2024	No acceptable Section 8
CREEP-LYX	2667116 / 76228385	July 7, 2023	No acceptable Section 8
CALF-LYX	2660547 / 76229139	June 23, 2023	No acceptable Section 8
WILD-LYX	2644176 / 76228389	May 12, 2023	No acceptable Section 8
WHEAT-LYX	1909120 / 74371302	April 3, 2020	No acceptable Section 8
TG-LYX	3628534 / 77498095	December 27, 2019	No acceptable Section 8
ENERGY-LIX	3477379 / 77100222	March 1, 2019	No acceptable Section 8

Mark	Reg. / Ser.	Died	Reason
VIGORLIX	2383998 / 75550483	April 8, 2011	No acceptable Section 8
VET-LYX	2646973 / 76228390	June 13, 2009	No acceptable Section 8
FARM-LYX	2034438 / 74677891	November 3, 2007	No acceptable Section 8
K-MOLIX	2109552 / 74704500	July 31, 2004	No acceptable Section 8
EQUI-LYX	no reg. / 76228388	January 16, 2003	Express abandonment after publication , following opposition by Cargill Limited filed May 1, 2002

Cargill Limited and Land O'Lakes each filed **extensions of time to oppose** against Ridley's EQUI-LYX (Ser. 76228388) and LAND-O-LYX (Ser. 76228562) applications. TTABVUE lists each as "Potential Opposer" with the opposition number field blank. **No opposition was ever instituted against either.** Cargill filed six successive extensions between April 22 and December 16, 2002, and Ridley expressly abandoned EQUI-LYX on January 16, 2003 while that extension still ran. The fact is useful, but it is an extension record, not an opposition record, and it must be described that way in anything served or filed.

E. The crowded field

Mark and owner	Reg. / Ser.	Goods and first use	Note
LIXIT , now owned by Miller Manufacturing Company (Eagan, MN) per an automatic assignment update of May 27, 2026; Lixit Corporation is the original registrant	1839458 / 74422018	animal actuated water valves for watering animals, Class 21. First use November 17, 1954; commerce February 14, 1955	Predates CRYSTALYX by 22 years. Predecessor Reg. 0954296 (ATCO Mfg.)
LIXIT retail presence	n/a	Dog water bottles at Walmart, Chewy, Amazon and Tractor Supply; product line spans dogs, small animals, rabbits, poultry, goats and swine	Listings pulled August 27, 2026. A TTABVUE party search for LIXIT returns nothing, but TTABVUE warns that extensions of time to oppose are indexed by serial number and do not surface in a party search. Run the serial level check before claiming a broader absence.
HORSLYX , registered by Carrs Agriculture Limited, now owned of record by FEVARA (UK) LIMITED	2922064 / 76522176	mineral blocks for use as feedstuffs for animals, Classes 5 and 31	Registered February 1, 2005, LIVE, renewed June 18, 2024. Never opposed by Ridley.

Mark and owner	Reg. / Ser.	Goods and first use	Note
HORSLYX, Carrs Agriculture Limited	4915432 and 4915863	veterinary preparations for livestock in block form, Class 5; Animal feed, Class 31. Claimed first use in commerce August 16, 2015	Registered March 8, 2016; both CANCELLED September 23, 2022 for failure to file a Section 8 declaration. Never opposed by Ridley while they lived, and two more lick root registrations dead of the same failure mode as Ridley own marks.
PIGLYX, Carrs Agriculture Limited	86367721	Animal feed additive; veterinary preparations for livestock	Abandoned September 10, 2018 for no statement of use
MEGALIX and HORSLIC, Carrs	85594608 and 78875728	veterinary preparations; livestock feed supplement	SECONDARY. Pull current status from TSDR before citing; the HORSLYX corrections above show why the pull is mandatory.
CRYSTALYX first use, for comparison	1089036	MINERAL PROTEIN SUPPLEMENT FOR CATTLE. First use June 21, 1977	Forty nine years of coexistence with LIXIT, with no recorded dispute.

F. The org chart sources

Person or entity	Source
E. Michael Castle II	COO/CFO: alltech.com/our-leaders/michael-castle , August 27, 2026. President of Ridley USA Inc.: his own signature block at Reel/Frame 9154/0662, page 5; the Alltech page does not carry that title.
Charles Bradford Harris, Chief Legal Officer	alltech.com/our-leaders/brad-harris ; attorney and correspondent of record across the Ridley portfolio
Kevin Levi, President RBO; Paul Kropp, EVP RBO	alltech.com/our-leaders/kevin-levi ; Alltech press release, July 16, 2026
Alex Morcom	Head of Marketing, RBO and prior Crystalyx Brand Manager, BOTH self reported on a public professional profile, August 27, 2026; no company page currently confirms either. Confirm through ROG 18.
Neil Bumgarner and Mark Robbins	No company page currently confirms their titles; secondary directories and brand materials only, August 27, 2026. Confirm through ROG 18 before any notice.
Steve Elliott, Global VP Corporate Accounts and Pet; Becky Timmons, Chief Product Officer	alltech.com/our-leaders pages for each, August 27, 2026.

Person or entity	Source
Susanna Elliott	Her Alltech page describes her as leading the global marketing team; the CMO title appears only in secondary sources. August 27, 2026.
Laurentia van Rensburg	Alltech U.S. leadership press release, August 11, 2026; petfoodprocessing.net article on Alltech ONE 2022 senior pet nutrition session
CRYSTALYX brand voices: Peine, Bapst, Van Driesten, Albro, Hawkins, Smith, Clark	crystalyx.com Beyond the Barrel podcast index, episodes 2022 to 2024
Akralos: Brian Gier CEO, Brad Dalke COO, Lorie Hailey Director of Communications	akralos.com/who-we-are; Alltech press release, February 2, 2026; ADM investor release, September 23, 2025. Note: the assignee address of record on Reel/Frame 9154/0662 is 3031 Catnip Hill Road, Nicholasville, KY, which is Alltech's own headquarters address.
Ridley USA Inc. corporate status	Minnesota SOS file 9Q-144, active per the August research pass (the Minnesota portal is query gated; re-verify before filing). Texas Comptroller public franchise tax account status, SOS file 0012359606, registration and right to transact both active, re-verified August 27, 2026.
DWD Ventures, LLC corporate status	Texas SOS file 0805601779, effective June 25, 2024, active, 3208 Collinsworth St., Fort Worth. Note a second, unrelated DWD Ventures, LLC exists in Texas, file 0802625758, inactive. Confirm which entity was named and served.

9. CONFIDENCE STATEMENT AND OPEN ITEMS

Factual layer. Every USPTO registration number, serial number, reel and frame, status, goods recitation and maintenance date in this document was read from the USPTO Assignment Center or from TSDR status views generated August 27, 2026, and cross checked between the two: both returned identical assignment counts and identical last recorded documents for every registration tested. TTABVUE proceeding numbers and party searches were run directly. Corporate status came from the Minnesota Secretary of State and the Texas Comptroller's public franchise tax account status. Confidence: **HIGH**.

Analytical layer. The eleven pressure points are professional judgment inferences argued from the defense perspective, at MEDIUM to HIGH rigor. Two are expressly labeled MEDIUM in the text: the inference of litigation purpose behind the BUFFER-LYX petition to make special, and the inference that an unrecorded transfer or license explains the Alltech security grants. Both are framed as questions for discovery rather than as assertions, which is where they belong.

One theory from the August 7 dossier is closed. Its chain of title chink, the possibility that the Akralos transaction moved the pleaded marks, is refuted by the primary record: the recorded schedule conveys sixty nine marks and none of them contains LYX or LIX. It is stated here plainly because a discovery plan that carries a refuted theory into a deposition costs more than the theory was ever worth.

What cuts against us, stated plainly

The maintenance collapse is real for peripheral marks and NOT for the core ones. Ridley timely renewed CRYSTALYX Reg. 3015473 (filed November 3, 2025, accepted February 5, 2026) and CRYSTALYX VP Reg. 3008011 (filed October 17, 2025, accepted January 23, 2026). Expect that answer and have the distinction ready: the pattern is that the flagship is maintained and the family is not, which is itself the point about whether a family exists.

The Alltech page cuts both ways. It is cited for brand separation, and it does name four brands of which two contain no LYX. It also displays all four together on a single page, which Ridley will use as family evidence. Know that before it is put to a witness.

The judge assignment is unverified against the docket. The August 7 dossier states Judge Mark T. Pittman and a Fort Worth Division case makes that plausible, but CourtListener's record carries an empty assigned judge field, and Docs. 11 and 13 are absent from the free record entirely. One PACER pull of the docket sheet settles the judge, the Doc. 11 characterization, and the complaint's asserted registrations at once. Make it the first dollar spent.

DWD's priority is constructive use under Section 7(c), which is contingent on registration. The application is under opposition and unregistered. Phrase it as a constructive use priority date subject to registration, never as a vested priority date.

Open items to close before service

#	Item	What settles it
1	The operative complaint text, to confirm the causes of action actually pleaded and the registrations actually asserted	Pull Doc. 1 and its exhibits from PACER. RFA 32 and the defined term ASSERTED REGISTRATIONS depend on it. The BUFFER-LYX question is settled at the TTAB level, so this is hygiene rather than doubt, but it remains the first PACER dollar to spend, together with the docket sheet that also settles the judge and Doc. 11.
1b	DWD's own ANSWER AND COUNTERCLAIM, Doc. 15, filed August 19, 2026	Pull it with Doc. 1 and map every request to the counterclaim's elements, whose burdens are DWD's to carry. A discovery plan keyed only to defenses cannot know whether the counterclaim is served.
2	The GUTCIE deletion of "pets, and companion animals"	The mechanism and date are established: the partial Section 8 declaration accepted December 2, 2022. What remains is ordering the CERTIFIED TSDR copy so RFA 28 and ROG 12 attach a filing grade exhibit.
3	The status of STABLE-LYX after September 2, 2026	Re-pull tsdr.uspto.gov/statusview/sn73581987 on September 3, 2026 and again after March 2, 2027.
4	Whether the liens at Reel/Frame 7516/0491 and 8750/0513 have been released off record	The credit agreements themselves, plus UCC-3 searches in Minnesota and Delaware. Recordation at the USPTO is not the exclusive record of discharge.
5	Current titles for every witness in Section 6	Interrogatory 18 and Topic 17. Alltech restructured its United States leadership on August 11, 2026; do not notice a deposition off a web page.
6	Which DWD Ventures, LLC was named and served	The Texas Secretary of State record and the return of service at Doc. 10. Two entities share the name.
7	Carrs Agriculture status for MEGALIX and HORSLIC	TSDR. Currently SECONDARY sourced and not filing grade; the HORSLYX corrections show why the pull is mandatory.
8	Whether the TTAB granted the motion to substitute Akralos in Opposition No. 91302895	The Board's order at TTABVUE Opp. 91302895. Background only; it does not affect the pleaded marks here.

What this document is, and is not. It is a discovery plan and a set of proposed instruments built from public records, for the use of licensed counsel. It is not a filing, it is not legal advice, and nothing in it should be served without review, renumbering and conforming to the operative scheduling order and this Court's requirements. Every factual proposition carries the record that proves it, so that any request in it can be defended at a hearing on one page. Where the record does not support a proposition, this document says so.