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Filing date: **10/17/2014**

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

Proceeding	91211530
Party	Plaintiff J-Lynn Entertainment, LLC
Correspondence Address	NEADOM T MEDINA J LYNN ENTERTAINMENT LLC PO BOX 12365 MILL CREEK, WA 98012 UNITED STATES tamar@j-lynnentertainment.com
Submission	Other Motions/Papers
Filer's Name	Neadom T Medina
Filer's e-mail	tamar@j-lynnentertainment.com
Signature	/Neadom T Medina/
Date	10/17/2014
Attachments	Notice of Deposition_Juan Carillo_Opposition_No_91211530.pdf(47846 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board

Registration No. 3682041
For the mark ADVENTURES OF SHADOW,

J-Lynn Entertainment, LLC,	:	
	:	
Petitioner,	:	
	:	Opposition No. 91211530
	:	(Parent)
	:	
vs.	:	Cancellation No. 92056491
	:	(Child)
William T. Odonnell,	:	
	:	
Registrant.	:	

OPPOSER’S NOTICE OF DEPOSITION PURSUANT TO FED.R.CIV.P.30(b)(1)(4)

Please Take Notice that, pursuant to Rule 30(b)(1)(4) of Federal of Civil Procedure, Opposer J-Lynn Entertainment LLC (“Opposer”) will take the deposition upon oral examination of Juan Carrillo regarding this Trademark cancellation and opposition proceeding against Applicant William T Odonnell Jr (“Applicant”) and regards the subject matters listed in the attached Exhibit A. After receiving harassing emails and phone calls and threats of a lawsuit by William T Odonnell Jr (“Applicant”) the Plaintiff J-Lynn Entertainment LLC investigated and found that William T Odonnell Jr (“Applicant”) has harassed and threatened lawsuits against other individuals and organizations, and also was subject to trademark cancellation for his mark “Adventures of Shadow” in relation to his pet dog for abandonment, non-use, and fraud. You have been summoned to give oral deposition by phone about William T Odonnell Jr (“Applicant”), services and products that he offers, and his trademark. Please take further notice that this examination will commence at 8:45am Pacific Standard Time on November 6th 2014 via telephone conference call and will be recorded by audio recording and will last 10 to 45 minutes. To attend the conference, call 1 (773) 897-3000 and enter access code 995-249-941.

If you have any questions or concerns or would like to re-schedule the deposition the weekend of November 1st 2014 please contact Neadom T Medina (“Member”) of J-Lynn Entertainment LLC via telephone at 440-610-5827 or email at tamar@j-lynnentertainment.com. A subpoena will also be issued in regards to this examination requiring you to attend. Although this legal matter strictly involves a cancellation proceeding against William T Odonnell Jr (“Applicant”) you have the right to have an attorney present during this oral deposition.

Trial Deposition of Juan Carrillo

- 1. Please join my meeting from your computer, tablet or smartphone on Thu, Nov 6, 8:45 AM Pacific Standard Time
 - <https://global.gotomeeting.com/join/995249941>

- 2. Use your microphone and speakers (VOIP) for audio. You'll sound best with a headset. You can also call in using your telephone.
 - United States (Long distance): +1 (773) 897-3000

Use Access Code: 995-249-941

Respectfully submitted on October 17, 2014

J-Lynn Entertainment, LLC
/Neadom T Medina/
Neadom T Medina
PO BOX 12365
Mill Creek, WA 98082
440-610-5827
tamar@j-lynnentertainment.com
Petitioner

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

Registration No. 3682041
For the mark ADVENTURES OF SHADOW,

J-Lynn Entertainment, LLC,

Petitioner,

vs.

William T. Odonnell,

Registrant.

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Cancellation No. 92056491
Opposition No. 91211530

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I respectfully submitted a copy on this Notice of Reliance upon the Applicant and his counsel on October 17, 2014, to the Trademark Trial and Appeal Board and to be served, via first class mail and via the TTAB's Electronic System for Trademark Trials and Appeals (ESTTA), postage prepaid, upon:

Juan Carrillo
PO Box 157 Eureka, CA 95502

/Neadom T Medina/
Neadom T Medina

Member
PO BOX 12365
Mill Creek, WA 98082
440-610-5827

EXHIBIT A

DEFINITIONS

- A. The term “Applicant’s Mark” means Applicant William T Odonnell Jr’s mark “Adventures of Shadow” and Design, which currently registered and pending additional federal application in the classification of goods and services for clothing.
- B. The term “Opposer’s Mark” means Applicant J-Lynn Entertainment LLC’s mark “The Adventures of Shadow Cat” for which it owns a pending federal application.
- C. The term “Applicant” means William T Odonnell, and anyone or entity action on his including without limitation to officers, directors, members, employees, stockholders, partners, predecessors, limited liability companies, dba’s, subsidiaries, affiliates, agents, representatives, and attorneys.
- D. The term “Opposer” means William T Odonnell, and anyone or entity action on his including without limitation to officers, directors, members, employees, stockholders, partners, predecessors, limited liability companies, dba’s, subsidiaries, affiliates, agents, representatives, and attorneys.
- E. The term “communication” means the transmittal of information, in the form of facts, ideas, inquiries, or otherwise.
- F. The term “concerning” as used herein means relating to, referring to, describing, or constituting.
- G. The terms “and” or “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of discovery request all responses that might otherwise be construed to be outside of its scope.
- H. The use of the singular form of any word includes the plural and vice versa.
- I. The terms “fraud” and “fraudulent” as used herein means the act of misleading, the act of providing false information, the act of trickery, any act of deception, instances of deceit, false statements, alterations to mislead or misinform, or the act of a hoax.
- J. The term “mental illness” as used herein means born with or suffering from mental or psychological conditions including but not limited to obsessive compulsive disorder, autism, asperger syndrome, obsession, intrusive thoughts, a mental disorder not allowing the Applicant to properly manage his trademarks, a mental disorder that would lead the Applicant to give false information, intrusive thoughts, delusional disorders, attachment disorders, obsession with animals, obsession with dogs, and other forms of obsessive and obtrusive behavior.

TOPICS FOR DEPOSITION

1. William T Odonnell Jr's ("Applicant") motivation behind harassing J-Lynn Entertainment LLC, it's members and other individuals and organizations.
2. William T Odonnell Jr's ("Applicant") motivation for threatening lawsuits against J-Lynn Entertainment LLC and other individuals and organizations.
3. William T Odonnell Jr's ("Applicant") motivation for threatening Aardman Animations based on a post by an innocent child made on the company's online fan forum.
4. William T Odonnell Jr's ("Applicant") giving of fraudulent information and materials when submitting trademark applications to the United States Patent and Trademark Office.
5. William T Odonnell Jr's ("Applicant") inability to provide the Opposer with records of sales receipts, sales records, and taxes paid for products using the Applicant's Adventures of Shadow Mark.
6. William T Odonnell Jr's ("Applicant") action of deception by modifying and removing information from his water bottle labels during the Opposer's Written Discovery request.
7. William T Odonnell Jr's ("Applicant") belief that he has exclusive rights to the word "Shadow" and "Adventures." The basis for his belief, and why his rights supersede all previous uses of the two words in various combinations by various individuals and companies for publications, films, games, movies, books, software, clothing, toys, and other various merchandise over the last two centuries.
8. How did William T Odonnell Jr ("Applicant") come to learn about J-Lynn Entertainment LLC and its mark "The Adventures of Shadow Cat".
9. William T Odonnell Jr's ("Applicant") use and motivation of using his mark with clothing.
10. William T Odonnell Jr's ("Applicant") methods of finding individuals and organizations using the words "Shadow" and "Adventures" on their websites and products and the means he has used to get information on them.
11. William T Odonnell Jr's ("Applicant") attempts to login to or hack social media sites or email accounts of J-Lynn Entertainment LLC, its members, and affiliates.
12. William T Odonnell Jr's ("Applicant") obsession with his pet dog and use of his mark.
13. William T Odonnell Jr's ("Applicant") overuse and display of his mark on social media, websites, church websites, and other organizations not owned by the Applicant.
14. William T Odonnell Jr's ("Applicant") inability to provide a water bottle sample to the Opposer during a Written Discovery request.
15. William T Odonnell Jr's ("Applicant") inability or objection to providing information during discovery about the use of his mark in commerce. Information that should easily provide if someone had been using their mark in commerce since 2007.

16. Why William T Odonnell Jr's ("Applicant") has not sold any films, t-shirts, books, and water bottles prior to the filing of these proceedings.
17. Any form of mental illness William T Odonnell Jr is currently suffering from or previously suffered from that would cause him to fraudulently obtain a trademark or mislead the USPTO.
18. Why William T Odonnell Jr's ("Applicant") told an IPCybercrime investigator that he has no videos available and is still filming even though he indicated to the USPTO that the mark was already being used in commerce.
19. William T Odonnell Jr's ("Applicant") use of his mark during religious ceremonies and church organizations.
20. William T Odonnell Jr's ("Applicant") conception, creation, selection, design, and decision to use or intent to use the Applicant's Mark on the Applicant's products and/or services, including alternative games or marks considered.
21. William T Odonnell Jr's ("Applicant") decision to begin offering his goods and services in the United States, including analysis conducted by the Applicant of the Applicant's Mark and actual perceived competitors.
22. The date(s) the Applicant's Mark was first used in commerce in the United States or globally, and the products or services on which it was used, and on which future use is it planned.
23. When William T Odonnell Jr's ("Applicant") first registered his Café Press site and started selling products, goods, and services.
24. Discussion of Café Press products and services William T Odonnell Jr ("Applicant") is using and has used in the past.
25. The nature of Café Press's products and services.
26. The types and products and services sold by William T Odonnell Jr ("Applicant") through Café Press Inc.
27. Any fraudulent or misleading information provided by William T Odonnell Jr "Applicant" to Café Press Inc.
28. Who told or informed the William T Odonnell Jr "Applicant" about Café Press Inc and its services.
29. Why William T Odonnell Jr only started products online through Café Press Inc after the Opposer filed a cancellation proceeding against the Applicant's mark.
30. Any knowledge of other Café Press customers that are represented by William T Odonnell Jr's ("Applicant") attorney Matthew H Sywers and The Trademark Company PLLC.