

ESTTA Tracking number: **ESTTA635152**

Filing date: **10/27/2014**

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	Opposition/Response to Motion
Filer's Name	Neadom T Medina
Filer's e-mail	tamar@j-lynnentertainment.com
Signature	/Neadom T Medina/
Date	10/27/2014
Attachments	Opposer's_Response_of_Motion_to_Quash_Witnesses_Opposition No.91211530.pdf(35696 bytes ) Op- poser's_Response_of_Motion_to_Quash_William_T_Odonnell_Sr_Opposition No.91211530.pdf(18226 bytes ) Exhibit_1_Opposer's_Response_of_Motion_to_Quash_Witnesses_Opposition No.91211530.pdf(233991 bytes ) Exhibit_2_Opposer's_Response_of_Motion_to_Quash_Witnesses_Opposition No.91211530.pdf(523790 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 OPPOSITION TO APPLICANT’S MOTION TO QUASH NOTICE OF**  
**DEPOSITIONS**

Opposer J-Lynn Entertainment LLC, respectfully submits its response and opposition to the Applicant’s Motion to Quash Notice of Depositions for George Eitzen, Rick McRostie, Jerry Dean Greer, Sean McLaughlin, Jenisha Wilhelmi, and Juan Carillo.

**Factual Review**

On 7-4-2014 trial dates for this Opposition proceeding were reset by Interlocutory Attorney Jennifer Krisp in which both the Opposer and Applicant were notified of dates of the trial periods for this proceeding. The Applicant and his counsel on 9-23-2014 requested via email to perform depositions via telephone. In which the Opposer agreed. On 9-27-2014 the Opposer contacted the Applicant’s counsel notifying them of the full list of witnesses the Opposer intended to interview for trial depositions in Pre-Trial Disclosures. On the dates of 9-29-2014, 10-1-2014, 10-8-2014, 10-15-2014, the Opposer requested the Applicant and his counsel verify the most up to date physical addresses for William T Odonnell Jr, William Odonnell Sr, George Eitzen, Rick McRostie, Jerry Dean Greer, Sean McLaughlin, Jenisha Wilhelmi, and Juan Carillo which they have not provided.

## **Arguments**

1. J-Lynn Entertainment (“Opposer”) states the fact it is representing itself and the representing member for J-Lynn Entertainment, Neadom T Medina is not an attorney and respectfully asks the Trademark Trials and Appeal Board to take this into special consideration the Opposer’s lack of knowledge in trademark proceedings. The Opposer approaches these proceedings solely in an attempt to protect itself from threats of lawsuits and trademark opposition made by the Applicant via email, telephone, and social media.
  
2. The Applicant’s Counsel Mathew W Swyers has almost 15 years of experience as a Trademark Attorney and working as an Examining Attorney at the U.S. Patent and Trademark Office. Based on this experience Mr. Swyers should be fully aware of Trademark Cancellation and Oppositions Proceedings and procedures. The Opposer presents these following factual arguments.

(A) Testimony Periods in these proceedings include Trial Depositions. The Applicant and his counsel should not have been taken by surprise by Notices of Depositions.

(B) Mr. Swyers should be aware of TTABVUE online, gets notifications via email on documents filed on TTABVUE which documents regarding Notice of Depositions were filed on October 17<sup>th</sup> 2014 through ESTTA giving Mr. Swyers and the Applicant 14 days notice prior to the second scheduled deposition on October 30<sup>th</sup> 2014 and up to 21 days notice for the last of these depositions on November 6<sup>th</sup> 2014 (SEE EXHIBIT 1). Not including previous indications to the Applicant the intention to file Notice of Depositions prior via email as early as October 1<sup>st</sup> 2014. Also through pretrial disclosures served on September 27<sup>th</sup> 2014. The Opposer feels this is ample time for notification for the Applicant and his experienced and resourceful counsel.

(C) Mr. Swyers has a full time staff to help monitor these proceedings via mail, email, and TTABVUE. They should have been fully aware of any filings via TTABVUE.

(D) Mr. Swyers and the Applicant have been notified via First Class Mail and email in relation to these trial depositions and witnesses, and were fully aware of the intentions of the Opposer to perform trial depositions during the Opposer's Testimony period.

(E) Mr. Swyers having knowledge of the Opposer's Trial Period should have been responsible and set aside the time for trial depositions and to fully represent his clients.

(F) The Applicant and his counsel Mr. Swyers knows that Neadom T Medina is the acting member/officer for the Opposer for these proceedings.

3. The Applicant's Counsel Mathew W Swyers argues that the depositions are prejudicial and libelous in nature. The Opposer argues against that based on the fact that the Applicant's websites state some form of goods or service provided at organizations lead by George Eitzen, Rick McRostie, Sean McLaughlin, Jenisha Wilhelmi, and Juan Carillo (SEE EXHIBIT 2). Since the Applicant has refused or cannot produce sales receipts or sales records of his trademark in commerce. The Opposer has found it necessary, relevant, and not prejudicial nor libelous to perform depositions on these witnesses because can provide insights on the type of services the Applicant has been conducting at their organizations. They can also verify whether or not products have been sold using the Applicant's mark at their organizations and provide documentation proving that. The Opposer also argues that given the witnesses relationship to the Applicant. These witnesses are not friendly to the opposing party, and are in favor of the witness.

4. The Applicant's Counsel Mathew W Swyers argues that the Notice of Deposition for Jerry Dean Greer is prejudicial and libelous in nature. The Opposer argues against this because during its investigation of this proceeding. This witness has commented on the Applicant's 2013 calendar bearing his mark. He has also been active in social media activity on Facebook in relation to the Applicant's trademark. Since the witness appears to have firsthand experience and knowledge of at least some products and activities relating to the Applicant's trademark. The Opposer finds it necessary, relevant, and not prejudicial nor libelous to take deposition of this witness.
5. The trial depositions are by telephone at the request of the Applicant's counsel. It does not require any travel or accommodations for the witnesses, Applicant, or the Applicant's counsel other than using a telephone to dial in. Depositions would be between the lengths of 10 to 60 minutes of questioning by the Opposer.
6. The Opposer feels that due to the Applicant's counsel's Matthew H Swyers and The Trademark Company's business model of low cost/flat fees and use of template services to obtain high sales and high customer volume. Mr. Swyers just doesn't want to spend the time having himself or his staff participate in these depositions.
7. Fed. R. Civ. P. 30(b)(1) States in General. A party who wants to depose a person by oral questions must give reasonable written notice to every other party. The notice must state the time and place of the deposition and, if known, the deponent's name and address. If the name is unknown, the notice must provide a general description sufficient to identify the person or the particular class or group to which the person belongs.  
  
As previously stated, the Opposer has given the Applicant and his counsel 14 to 21 days notice regarding these six Notice of Depositions in question. The Opposer believes this is reasonable notice given the Opposer's 30 day trial period.

8. 37 C.F.R. § 2.124 Depositions upon written questions, states a party desiring to take a testimonial deposition upon written questions shall serve notice thereof upon each adverse party within 10 days from the opening date of the testimony period of the party who serves the notice. The Applicant was given between 14 to 21 days by the Opposer.
  
9. The Opposer has reviewed 703.02(a) from Trademark Trial and Appeal Board Manual of Procedure, and this rule does not mention any requirement of a party to name an Officer who is to Administer Depositions.

**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 reply to Applicant's motion to quash notice of depositions upon the Applicant and his counsel and to the Trademark Trial and Appeal Board via the TTAB's Electronic System for Trademark Trials and Appeals (ESTTA) on October 26, 2014

Matthew H. Swyers  
The Trademark Company  
2703 Jones Franklin Road, Suite 206  
Cary, NC 27518

The Trademark Company  
344 Maple Avenue West, PMB 151  
Vienna, VA 22180

/Neadom T Medina/  
Neadom T Medina

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

**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 RESPONSE TO APPLICANT’S MOTION TO QUASH NOTICE OF DEPOSITION  
OF WILLIAM T ODONNELL SR**

Opposer J-Lynn Entertainment LLC, respectfully submits its response to the Applicant’s Motion to Quash Notice of Depositions for William T Odonnell Sr set forth on October 28<sup>th</sup> 2014.

**Conclusion**

Although this witness would be essential for trial depositions given he lived in the house where the Applicant ran his business out of. J-Lynn Entertainment LLC (“Opposer”) agrees to cancel the deposition for William T Odonnell Sr and has not filed a subpoena for his deposition giving the following arguments.

**Arguments**

1. Given the witness’s age, health condition, and mental condition. Given the witness who shares the same address as the Applicant appears that the home has been empty and for sale since last

April. Since this appears to be true, the Opposer believes the Applicant's counsel plea based on the witness's health.

2. Given the relationship of the witness to the applicant. The Opposer feels that there will be a bias during the deposition, and this witness will have favoritism towards the Applicant.
  
3. As for the Applicant claiming not having adverse notice. The Opposer argues that the Applicant has been fully aware of the trial dates and should have made accommodations in anticipation of depositions during the Opposer's trial period. The Opposer also argues that the Applicant and his counsel was given notice of what witnesses were going to be given a Notice of Deposition via email on 10-10-14. The Opposer also requested for the Applicant to verify the addresses of the witnesses.
  
4. The Opposer gives the up most respect to the witness who is a former war veteran. If he suffers from a heart condition. The Opposer does not wish to put additional stress or worry upon this witness.



ESTTA Tracking number: **ESTTA633457**

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_ccs@yahoo.com
Signature	/Neadom T Medina/
Date	10/17/2014
Attachments	Notice of Deposition_Jerush Wilhelmi_Opposition_No_91211530.pdf(47819 bytes ) Notice of Deposition_Sean McLaughlinOpposition_No_91211530.pdf(47775 bytes ) Notice of Deposition_Juan Carillo_Opposition_No_91211530.pdf(47846 bytes ) Notice of Deposition_Jerry Dean GreerOpposition_No_91211530.pdf(48052 bytes ) Notice of Deposition_Rick McRostie_Opposition_No_91211530.pdf(47865 bytes ) Notice of Deposition_George Eitzen_Opposition_No_91211530.pdf(47821 bytes ) Notice of Deposition_William T Odonnell Sr_Opposition_No_91211530.pdf(47923 bytes ) Notice of Deposition_William T Odonnell Jr_Opposition_No_91211530.pdf(46782 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 Jerusha Wilhelmi 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 5<sup>th</sup> 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 (872) 240-3312 and enter access code 435-172-773.

If you have any questions or concerns or would like to re-schedule the deposition the weekend of November 1<sup>st</sup> 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 Jerusha Wilhelmi

- 1. Please join my meeting from your computer, tablet or smartphone on Wed, Nov 5, 8:45 AM Pacific Standard Time
  - <https://global.gotomeeting.com/join/435172773>
  
- 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 (872) 240-3312

Use Access Code: 435-172-773

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.	:	Cancellation No. 92056491
	:	Opposition No. 91211530
William T. Odonnell,	:	
	:	
Registrant.	:	

**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:

Jerusha Wilhelmi  
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.

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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Registration No. 3682041  
For the mark ADVENTURES OF SHADOW,

J-Lynn Entertainment, LLC,	:	
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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 Sean McLaughlin 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 4<sup>th</sup> 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 (872) 240-3312 and enter access code 517-045-941.

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#### Trial Deposition of Sean McLaughlin

- 1. Please join my meeting from your computer, tablet or smartphone on Tue, Nov 4, 8:45 AM Pacific Standard Time
  - <https://global.gotomeeting.com/join/517045941>
  
- 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 (872) 240-3312

Access Code: 517-045-941

Respectfully submitted on October 17, 2014

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

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For the mark ADVENTURES OF SHADOW,

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Petitioner,	:	
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vs.	:	Cancellation No. 92056491
	:	Opposition No. 91211530
William T. Odonnell,	:	
	:	
Registrant.	:	

**CERTIFICATE OF SERVICE**

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Sean McLaughlin  
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.
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- 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.
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- 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.

**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 6<sup>th</sup> 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 1<sup>st</sup> 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.

**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 Jerry Dean Greer 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 3<sup>rd</sup> 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 (872) 240-3212 and enter access code 204-588-557.

If you have any questions or concerns or would like to re-schedule the deposition the weekend of November 1<sup>st</sup> 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 Jerry Dean Greer

- 1. Please join my meeting from your computer, tablet or smartphone on Mon, Nov 3, 8:45 AM Pacific Standard Time
  - <https://global.gotomeeting.com/join/204588557>
  
- 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 (872) 240-3212

Use Access Code: 204-588-557

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.	:	Cancellation No. 92056491
	:	Opposition No. 91211530
William T. Odonnell,	:	
	:	
Registrant.	:	

**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:

Jerry Dean Greer  
First Baptist Church of McKinlyville  
1490 Murray Rd McKinlyville, CA

Jerry Dean Greer  
1401 Merganser Dr, McKinleyville, CA 95519

/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.
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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.
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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.
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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.

**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 Rick McRostie 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 October 30<sup>th</sup> 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 (805) 309-0010 and enter access code 788-716-885.

If you have any questions or concerns or would like to re-schedule the deposition the weekend of November 1<sup>st</sup> 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 Rick McRostie

- 1. Please join my meeting from your computer, tablet or smartphone on Thu, Oct 30, 8:45 AM Pacific Daylight Time
  - <https://global.gotomeeting.com/join/788716885>
  
- 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 (805) 309-0010

Access Code: 788-716-885

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.	:	Cancellation No. 92056491
	:	Opposition No. 91211530
William T. Odonnell,	:	
	:	
Registrant.	:	

**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:

Rick McRostie  
First Covenant Church of Eureka  
2526 J Street Eureka, CA 95501

Rick McRostie  
3930 Lissa Eureka, CA 95503

/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.

**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 George Eitzen 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 October 31<sup>st</sup> 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 (646) 749-3131 and enter access code 413-745-685.

If you have any questions or concerns or would like to re-schedule the deposition the weekend of November 1<sup>st</sup> 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 George Eitzen

- 1. Please join my meeting from your computer, tablet or smartphone on Fri, Oct 31, 8:45 AM Pacific Daylight Time
  - <https://global.gotomeeting.com/join/413745685>
  
- 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 (646) 749-3131

Use Access Code: 413-745-685

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.	:	Cancellation No. 92056491
	:	Opposition No. 91211530
William T. Odonnell,	:	
	:	
Registrant.	:	

**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:

George Eitzen  
First Covenant Church of Eureka  
2526 J Street Eureka, CA 95501

/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.
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## 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.
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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.
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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.
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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.

**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 William T Odonnell Sr 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 October 29<sup>th</sup> 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 (312) 757-3121 and enter access code 231-698-605.

If you have any questions or concerns or would like to re-schedule the deposition the weekend of November 1<sup>st</sup> 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 William Odonnell Sr

- 1. Please join my meeting from your computer, tablet or smartphone on Wed, Oct 29, 8:45 AM Pacific Daylight Time
  - <https://global.gotomeeting.com/join/231698605>
  
- 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 (312) 757-3121

Access Code: 231-698-605

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



## 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.
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## 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.
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**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 William T Odonnell Jr (“Applicant”) regarding this Trademark cancellation and opposition proceeding against Applicant William T Odonnell and regards the subject matters listed in the attached Exhibit A. Please take further notice that this examination will commence at 8:45am Pacific Standard Time on October 28<sup>th</sup> 2014 via telephone conference call and will be recorded by audio recording and will last 30 to 120 minutes. To attend the conference call 1 (773) 945-1030 and enter access code 350-928-797.

If you have any questions or concerns 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.

Trial Deposition of William T Odonnell Jr

- 1. Please join my meeting from your computer, tablet or smartphone on Tue, Oct 28, 8:45 AM Pacific Daylight Time
  - <https://global.gotomeeting.com/join/350928797>

- 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) 945-1030

Use Access Code: 350-928-797

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.	:	Cancellation No. 92056491
	:	Opposition No. 91211530
William T. Odonnell,	:	
	:	
Registrant.	:	

**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 16, 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:

Matthew H. Swyers  
The Trademark Company  
2703 Jones Franklin Road, Suite 206  
Cary, NC 27518

The Trademark Company  
344 Maple Avenue West, PMB 151  
Vienna, VA 22180

William T Odonnell Jr  
PO Box 771 Bayside, CA 95524

William T Odonnell Jr  
7873 ½ Myrtle Ave Eureka, CA 95503

/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.

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**Welcome**

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Creation Family Bookstore has a 24/7 secure online store, [Creation Family Bookstore!](#) The store is always being updated.

**Creation Research of the North Coast Presents these programs at the following locations:**

- **EUREKA, CA - Creation Family Night**

Date: Wednesdays \* Time: 6:30p.m. - 8:30 p.m.  
Place: At First Covenant Church , 2526 J St. Eureka , CA. (Room 2, Upstairs in the Peterson House)

The themes lately are "Creation Evangelism - How to Witness today!"  
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- **Humboldt Access Channel 12 (Suddenlink)**

Creation Research Hour is on Fridays at 6:00 p.m. & Saturdays at 6:00 a.m.  
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- **Need a seminar at your church?** Give us a call and we would be happy to schedule one there for you.

**In the future we are still planning to build a museum somewhere in our area.** Noah's Ark?

Bill Odonnell, Jr.  
Sr. V.P. of C.R.N.C.



This one of my new sites [www.dogguidance.hub](http://www.dogguidance.hub) It is about how to train your dog.

# Exhibit 2