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Filing date: **06/11/2015**

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	Plaintiff's Notice of Reliance
Filer's Name	Neadom T Medina
Filer's e-mail	tamar@j-lynnentertainment.com
Signature	/Neadom T Medina/
Date	06/11/2015
Attachments	notice of reliance 2_Opposition_91211530_F.pdf(479522 bytes)

NOR Ex. Number	Deposition Exhibit	Description	Trademark Rule	Relevance
2	2 - Medina	Set of email correspondence from the Applicant	2.122(e)	Shows the Applicant had not legitimately used his mark in commerce for IC009, IC016, IC032, and IC025

Respectfully submitted on June 9, 2015

J-Lynn Entertainment, LLC
/Neadom T Medina/
Neadom T Medina
PO BOX 12365
Mill Creek, WA 98012
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 June 9, 2015, to the Trademark Trial and Appeal Board and to be served, via email, via FedEx, 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
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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

From: Bill Odonnell <crnc@creationnews.org>
To: p...@creationworks.biz
Sent: Thursday, August 30, 2007 1:40 AM
Subject: Re: CreationWorks & Pat

Hi Pat

Great to hear from you. Glad to see you branch out. We can not have enough or some say to us saturated. Why do people say that about our material and not the humanist side? I believe they domore then us.

delete

We have bottled water coming soon. We are probably the first creation ministry to do that!!! It says "Adventures of Shadow" is a Trademark of Odonnell Entertainment(R) my production company that I do mostly for St George Reef Lighthouse go to <http://www.stgeorgereeflighthouse.us/> I had some feed back in the USPS postage stamp that came out on St George on June 21, 2007 I've been working on that for about 1 1/2 years before it came out. From some things that I believed they should add to the script on the back and got to speak at the opening day ceremony for about 10 mins or so.

On St George it was shout down in the mid 70s. A few neat things going on out there that our ministry will focus on in the very near future. That should blow some more holes on the other sides issues.

The Adventures of Shadow is my dog who will travel around the country bring in the creation/evolution story. I have some of it trademark and copyright. This whole project will cost but I believe not to bad since I will edited, write, film , etc. my self once I figure out comp editing more, almost there.

We are in the works on changing our name to Creation Research of North America since we still want to build Noah's Ark as a museum. This was partly Frank Sherwin idea of changing our name to domestic instead of regional. Our ministry still gets around and ICR/AIG still seems to take some of our ideas we tell them they should do and they still do it. Our site still gets many hits. Have my own server I rent (in LA I believe) and have been pleased with it. Our Ministry does all this with about \$150.00 to \$200.00 a month plus a few sells.

Be in prayer has we try and get out there more. That is what we are doing with the water. The water we are using comes from a Spring which is getting as well known as some of the others. The person, one of the owners, comes Sunday eve and is at first giving us this at cost.

First him to get the Adventures of Shadow and now you ask us what you can do. I believe the Lord is finally waking our ministry up. Here we were the first to show Icr on cable, show the

videos with speakers, video seminars (which both AIG & ICR asked me for the impute on what we do for thier guides), to name a few.

I will contact you as soon as we get going on a project which I know you would like.

In His service

Bill

From: "Bill Odonnell, Jr." <billjr@odonnell.ws>
To: mag...@pacbell.net
Sent: Saturday, September 1, 2007 1:13 AM
Subject: Hello from Eureka

Hi Holly

Hope this finds you and your family in good health. Any plans this weekend? Saturday our ministry is going to Willow Creek - they have a special secular event that most anyone that live in that town and around it goes to. They have free Ice Cream , parade, then music with vendors. This will be our 2nd or 3rd year (I would have to check). The lady in charge of the event her and her husband likes our ministry and gets us a great location every year.

personal delete

Have you watch any or all of the Celebration of Life yet? Once you do you will see why Bob was a special part of our family and really liked our ministry besides the Pregnancy Care Center. To this day I try and not bring it up but people from our ministry will say, do you remember when "Uncle Bob " did this or that? Ben who spoke in the video just got married and wanted me to say Hi. He was mention off and on through out reception and at the wedding party since your dad was going to take pictures of this event.

Attachment is a water bottle that we will be selling probably as soon as next week, it is to promote our ministry and will help in getting funds for trips and documentary we are planing. Its the Adventures of Shadow, It will be a program and books (we hope and pray) about a dog going around the country informing kids about creation and the Lord. Amber will probably be the voice over - like Snoopy. Also a travel film I've seen many great documentary on Rt 66 but it would be boring for many kids. Be also in pray as this project needs will be the smaller trailer I E-mailed you about. I believe the travels and filming and editing the first two should cost around \$20000 plus duplication charges and promotions.

They will be on St George Reef Lighthouse and Mt St. Helen's. Then we want to do one on Grand Canyon and Rt 66, Price Edward Island these tthree will cost alot more not sure how much but we are always careful with the funding that comes in, if and when it does. Thanks for your prayers on this. I know your dad was planning on going with us when ever we started the project. That was before he came ill. But this was one of many items we talked about on Feb 17th for about 2 hours on the phone and the last I ever talked to him.

Well have a great weekend. If anything you want me to check about the house or anything here while you are down there just E-mail or call.

In His Service
Love Bill

PS Say Hi to your family for me.