

ESTTA Tracking number: **ESTTA677560**

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 1_Opposition_91211530_F_confidential_blacked_out.pdf(3147149 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 RELIANCE**

Pursuant to Trademark Rule 2.122(e), Opposer J-Lynn Entertainment LLC hereby introduces into evidence the following document. Exhibit 1, is a set of email correspondence between the applicant and other parties showing the applicant had not been using his mark and products in commerce on the applicant’s claimed date of 8-29-2007, showing that the applicant fraudulently misled the USPTO on his first use and first use in commerce for the classification of services IC009 Motion Picture Films, IC016 Books, IC032 Bottled Water, and IC025 Clothing. In the first email dated 8-29-2007 the Applicant is inquiring about having labels produced to eventually sell water bottles, but no water bottles or any other product using the Applicant's mark have not been produced or sold at this point. Given the obsession the Applicant has over his dog, which the mark is named for, he would have mentioned other products sold using the mark in the emails.

NOR Ex. Number	Deposition Exhibit	Description	Trademark Rule	Relevance
1	1 - Medina 8 - Odonnell, originally 11	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:

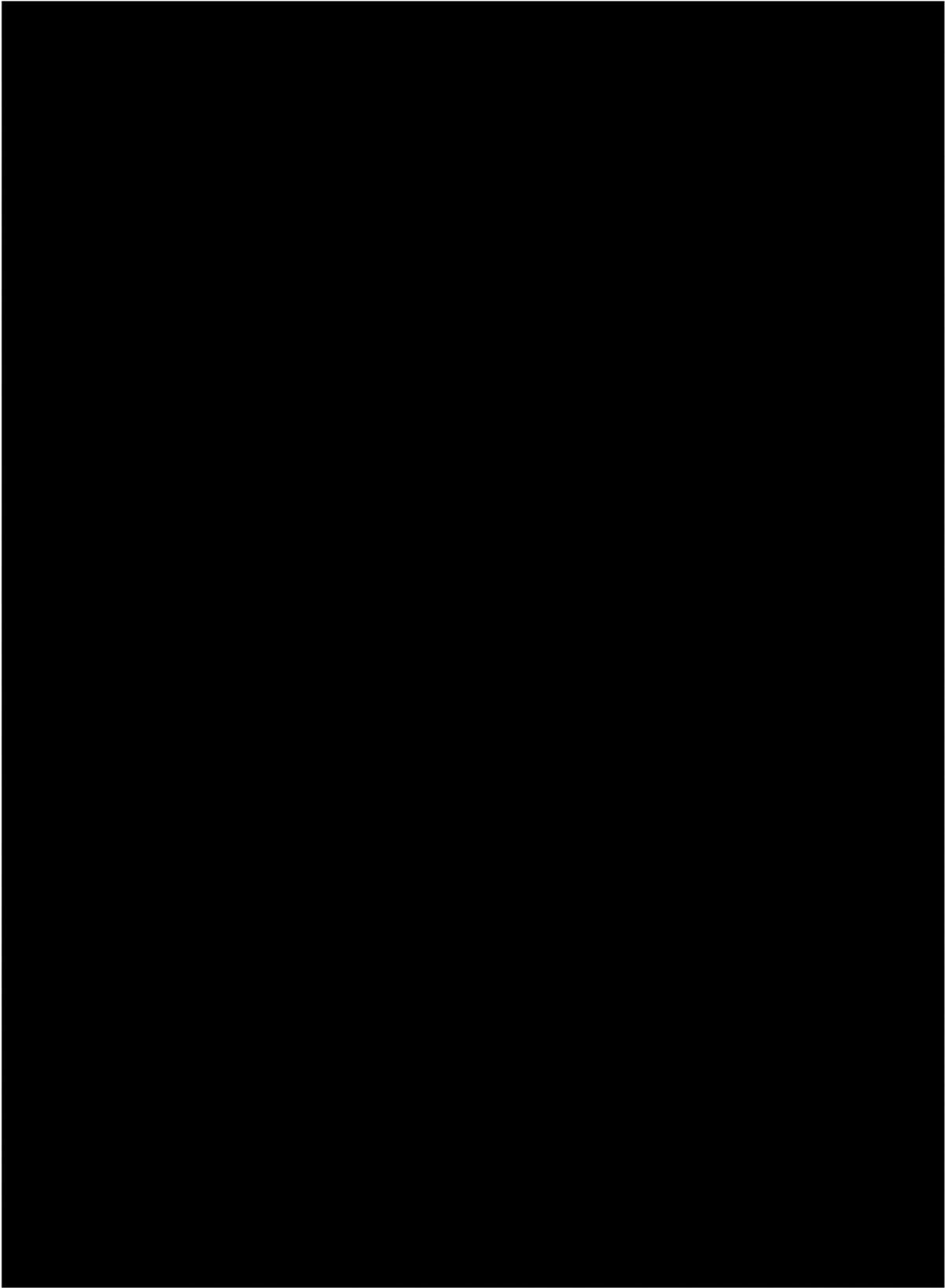
Matthew H. Swyers  
The Trademark Company  
2703 Jones Franklin Road, Suite 206  
Cary, NC 27518

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

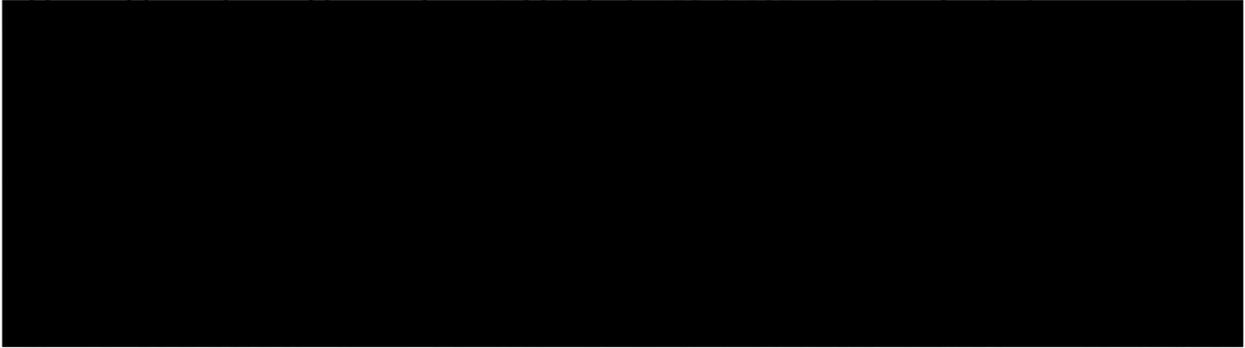
/Neadom T Medina/  
Neadom T Medina

Member  
PO BOX 12365  
Mill Creek, WA 98012  
440-610-5827

FIG 12 007  
**Confidential**



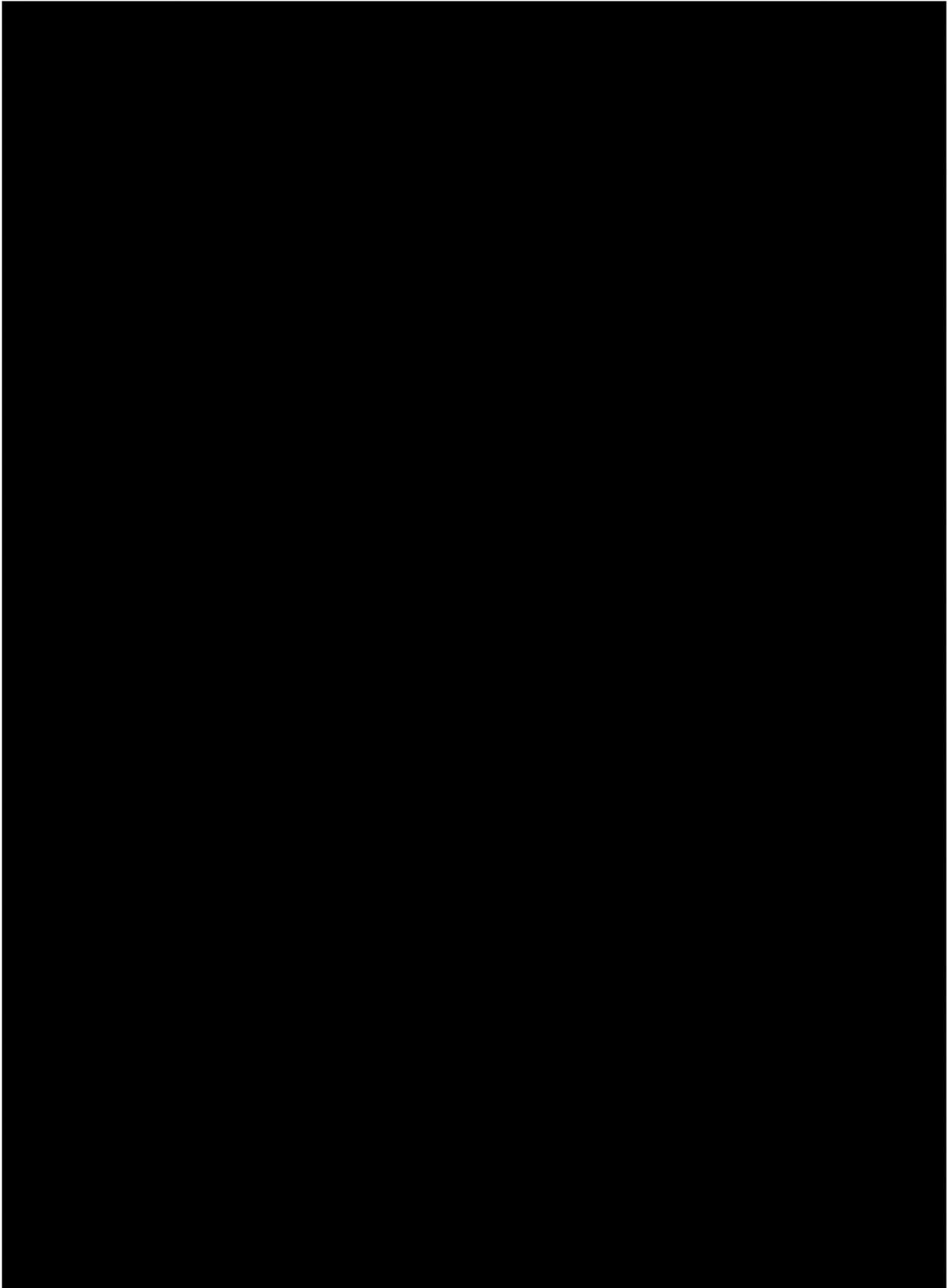
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# Confidential



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