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Filing date: **07/06/2015**

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	Reply in Support of Motion
Filer's Name	Neadom T Medina
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Signature	/Neadom T Medina/
Date	07/06/2015
Attachments	Opposers Response to Applicant's Opposition of motion to compel_Opposition_No_91211530.pdf(20767 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 REPLY IN SUPPORT OF ITS MOTION TO COMPEL CORRECT EXHIBIT
NUMBERS AND CONFIDENTIAL/TRADE SECRET LABELS**

Opposer J-Lynn Entertainment LLC, respectfully submits its reply in support of its motion to compel for verifying the correct exhibit numbers and what materials were requested confidential/trade secret.

Factual Review

During the deposition of William T Odonnell on May 26th 2015 both Applicant and his counsel skipped exhibits, renumbered exhibits, and numbered unlabeled exhibits. The Applicant also began requesting during his deposition certain materials within the exhibits to be considered trade secret that weren't originally labeled trade secret or commercially sensitive. J-Lynn Entertainment followed up on May 27th 2015 requesting the Applicant's Counsel Matthew Swyers to verify what exhibits his Applicant wanted confidential. J-Lynn Entertainment inquired five times to Mr. Swyers about verifying the correct exhibit numbers and which exhibits his client wanted confidential. All inquires have still been ignored to this day of June 6th 2015.

Statement of the Case

1. In response to the Applicant's Statement of the Case number 3 in the Applicant's opposition to this motion. At the start of deposition the exhibit numbers and confidential labels were properly labeled. The

Applicant and his counsel began changing exhibit numbers, removing exhibits, and verbally asking certain materials to be confidential that weren't originally labeled confidential.

2. In response to the Applicant's Statement of the Case number 4 in the Applicant's opposition to this motion. The statement that the Applicant has not received a copy of the Applicant's Deposition Transcript from the May 26th 2015 deposition is completely false. Verified copies were sent to the Applicant via FedEx and email.

Argument

J-Lynn Entertainment argues that this motion to compel is important because it will allow J-Lynn Entertainment to avoid improper filing of deposition transcripts, trial briefs, and notice of reliance. It also protects the Applicant from getting commercially sensitive information to the public.

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Petitioner,	:	
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	:	Opposition No. 91211530
William T. Odonnell,	:	
	:	
Registrant.	:	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I respectfully submitted a copy on this June 6, 2015, to the Trademark Trial and Appeal Board and to be served, via email and first class mail, postage prepaid, upon:

Matthew H. Swyers
The Trademark Company
2703 Jones Franklin Road, Suite 206
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/Neadom T Medina/
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