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Filing date: **08/24/2015**

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	Other Motions/Papers
Filer's Name	Neadom T Medina
Filer's e-mail	tamar@j-lynnentertainment.com
Signature	/Neadom T Medina/
Date	08/24/2015
Attachments	Plaintiff_Rebuttal_Disclosures_Opposition_91211530.pdf(34967 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 REBUTTAL DISCLOSURES

COMES NOW Opposer J-Lynn Entertainment LLC provides the following rebuttal disclosures upon Applicant William T Odonnell through his counsel Matthew H Swyers of The Trademark Company.

I. EXHIBITS

1. Exhibits Plaintiffs Expect to Offer

- a) Contents from the Applicant’s Written Discovery materials supplied by his counsel Matthew H Swyers. These contents include but are not limited to email correspondence, images, images altered by William T Odonnell Jr.
- b) Email correspondence between the J-Lynn Entertainment (“Plaintiff”) and William T Odonnell Jr (“Applicant”). Email Dates: 9-28-2012, 10-3-2012, 10-4-2012, 10-12-2012,
- c) Investigation report performed by IP Cyber Crime LLC and Rob Holmes. This investigation report includes but is not limited to screen captures, website revision logs, The applicant’s websites, summaries of conversations with the Applicant, search results, product inquires, sales inquires. Report finished October 15 2012.
- d) Screen captures of William T Odonnell’s Adventures of Shadow website prior to the cancellation proceeding being filed and afterwards, showing edited changes in response to the proceedings being filed.
- e) Audio recording of William T Odonnell (“Applicant”) calling and harassing Neadom T Medina and the Applicant stating legal threats and likeness of confusion in commerce.

- f) Examples of the Applicant's original water bottle label and a version altered by the Applicant in response to these proceedings.
- g) Recorded oral deposition of William T Odonnell ("Applicant") if the applicant hasn't avoided the deposition by the time of trial.
- h) Screen shots of a fake t-shirt with the "Applicant's" posted on his website and Facebook.
- i) Past harassing emails from William T Odonnell to other individuals and companies. Email Dates: 6-29-10, 7-2-2010, 7-2-2011, 8-3-2011
- j) Costco Photo Center Orders by William T Odonnell, Order Dates: 12-18-2012, 12-15-2012, 12-14-2012, 12-13-2012, 12-11-2012, 12-3-2012, 5-10-2012, 1-27-2011, 12-9-2010, 12-6-2010, 11-1-2010, 2-5-2010, 12-18-2009, 12-14-2009, 10-27-2009, 9-30-2009, 9-28-2009, 9-27-2009, 9-26-2009, 12-8-2008.
- k) Screenshots of William T Odonnell threatening posts to J-Lynn Entertainment's Facebook pages and fund raising campaign.
- l) Applicant William T Odonnell's email correspondence proving that the Applicant made the fraudulent claim that the Mark's first use in commerce was 8-29-2007. The date claimed on his trademark application." Email Dates: 8-28-2007, 8-29-2007, 8-30-2007, 9-1-2007, 9-4-2007

II. TRIAL TESTIMONY

1. Trial Testimony Plaintiffs Expect to Offer

- a) Trial Testimony from William T Odonnell Jr taken on May 26th 2015.
- b) Trial Testimony from Neadom T Medina taken on June 12th 2015.
- c) Trial Testimony from Robert L Holmes Jr taken on December 3rd 2014.

II. TRIAL BRIEFS

1. Trial Brief Plaintiffs Expect to Reference

- a) Opposer's Trial Brief served August 24th 2015.
- b) Applicant's Trial Brief.

Respectfully submitted on August 24th, 2015

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

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Registration No. 3682041
For the mark ADVENTURES OF SHADOW,

J-Lynn Entertainment, LLC,	:	
	:	
Petitioner,	:	
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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 August 24, 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
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/Neadom T Medina/
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