

ESTTA Tracking number: **ESTTA652926**

Filing date: **01/29/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91214649
Party	Plaintiff Noodle Time, Inc.
Correspondence Address	JANET C MOREIRA MAVEN INTELLECTUAL PROPERTY 5801 BISCAYNE BLVD MIAMI, FL 33137 UNITED STATES trademarks@maveniplaw.com, janet@maveniplaw.com, stephanie@maveniplaw.com
Submission	Motion for Sanctions
Filer's Name	Stephanie C. Alvarez
Filer's e-mail	stephanie@maveniplaw.com, janet@maveniplaw.com
Signature	/Stephanie C. Alvarez/
Date	01/29/2015
Attachments	FINAL MOT - Motion for Sanctions (Revised JCM 01292015).pdf(128596 bytes ) Binder - Motion for Sanctions.pdf(681842 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD**

**NOODLE TIME, INC.,**  
Opposer,

**Opposition No.: 91214649**

v.

Mark: **BENNY HUNNA**

Serial No.: 85/920,599

**BENNY HODGE,**  
Applicant.

Filing date: May 1, 2013

Publication Date: October 8, 2013

---

**MOTION FOR ENTRY OF JUDGMENT AS A SANCTION FOR APPLICANT'S  
FAILURE TO FULLY COMPLY WITH THE BOARD'S ORDER DATED DECEMBER  
5, 2014, AND TO SUSPEND PROCEEDINGS**

**I. INTRODUCTION**

Pursuant to 37 C.F.R. § 2.120(g) and T.B.M.P. §§ 523.02 and 527.01, Opposer, Noodle Time, Inc. ("NTI" or "Opposer"), by and through undersigned counsel, respectfully submits the following Motion For Entry of Judgment As a Sanction for Applicant's Failure to Fully Comply with the Board's Order Dated December 5, 2014, and To Suspend Proceedings, and submits the following memorandum and attached Declaration of Stephanie C. Alvarez, Esq. in support thereof.

**II. THE BOARD MAY RULE ON INSTANT MOTION DURING PENDENCY OF APPLICANT'S MOTION TO SUSPEND PROCEEDING FOR CIVIL ACTION AS IT IS POTENTIALLY DISPOSITIVE OF THIS CASE**

On January 25, 2015, Applicant filed a Motion to Suspend Proceeding for Civil Action ("Motion to Suspend") based on the pending civil action filed against Benny Hodge by Opposer's related company, Benihana National Corp. ("BNC"), in the United States District

Court for the Northern District of Mississippi.<sup>1</sup> See Exhibit to Applicant's Motion to Suspend. It is clear that Applicant's filing of his Motion to Suspend is a delaying tactic by Applicant to avoid complying with, not one but two, Board orders and from meaningfully participating in this proceeding. Applicant should not be allowed to continuously evade discovery in this matter.

In accordance with CFR. §2.117(b)<sup>2</sup>, Opposer respectfully requests that the Board decide the instant Motion, as it is potentially dispositive of this case, and deny Applicant's Motion to Suspend which is rendered moot by Opposer's Notice of Voluntary Dismissal.

### **III. BACKGROUND**

On September 4, 2014, NTI filed a Motion to Compel Discovery [DE 5] due to the fact that Applicant had failed to adequately respond to NTI's first set of written discovery. Applicant did not file a written response to the motion and the Board entered an Order [DE 7] granting NTI's Motion to Compel on November 4, 2014 ("First Order"). The First Order provided Applicant with an additional thirty (30) days, until December 3, 2014, to provide NTI with supplemental discovery responses. The First Order also stated that "*in the event that applicant fails to serve full responses as ordered herein, opposer's remedy may lie in a motion for sanctions, as appropriate. See Trademark Rule 2.120(g)(1).*" See First Order at p. 2 (emphasis added). Shortly thereafter, however, on November 19, 2014, Applicant filed a Motion for Reconsideration [DE 8] of Decision on Motion. Due to the fact that Applicant's motion

---

<sup>1</sup> BNC filed a Notice of Voluntary Dismissal Without Prejudice of the Complaint in action titled *BNC v. Benny Hodge*, Case No. 14-cv-0178-SA (N.D. Miss.) on January 27, 2015. See Exhibit A. It is anticipated that the Court will issue an Order of Dismissal in due course. Opposer reserves the right to oppose Applicant's Motion to Suspend once it receives a copy of the Order of Dismissal.

<sup>2</sup> CFR §2.117(b) provides "[w]henver there is pending before the Board both a motion to suspend and a motion which is potentially dispositive of the case, the potentially dispositive motion may be decided before the question of suspension is considered regardless of the order in which the motions were filed."

advanced untimely arguments in response to NTI's Motion to Compel and did not allege any appropriate grounds for reconsideration, the Board denied Applicant's Motion for Reconsideration by Order [DE 9] dated December 5, 2014 ("Second Order"), and reiterated the granting of NTI's Motion to Compel. Pursuant to said order, Applicant had until on or before December 26, 2014, to serve supplemental responses to NTI's first set of written discovery. Specifically, the Second Order states:

Accordingly, Applicant's request for reconsideration is **DENIED**. As stated in the Board's November 4, 2014 Order, Applicant must serve supplemental responses to Opposer's first set of interrogatories and its first set of document requests and subsequently serve Opposer with any responsive documents, as indicated in Opposer's motion no later than **TWENTY DAYS** from the mailing date of this order, without objection on the merits. [Citations Omitted].

\* \* \*

*If Applicant fails to respond to Opposer's discovery requests as ordered, Opposer's relief may be sought through a motion for sanctions, including the entry of judgment against Applicant.* See Trademark Rule 2.210(g); Fed.R.Civ.P. 37(b)(2).

Second Order at 3-5 (emphasis added) [DE 8].

The Board granted Applicant twenty (20) days from December 5, 2014 to comply with its Second Order. *Id.* Thus, Applicant's responses were due no later than December 26, 2014 as Applicant was not entitled to any additional time for mailing. *See* T.B.M.P. § 310.03(b) (five day extension for documents served by a party via first class mail, Express Mail or overnight courier is not applicable to deadlines set by the Board).

On December 25, 2014, Applicant served his Supplemental Answers to First Set of Interrogatories and Production of Document Request ("Supplemental Responses"). A copy of Applicant's Supplemental Responses are attached as Exhibit 1 to the Declaration of Stephanie C. Alvarez ("Alvarez Decl.") which is attached as Exhibit B hereto. Applicant's Supplemental

Responses, however, are virtually identical in substance to Applicant's initial discovery responses. They also fail to include ANY documents in response to Opposer's First Set of Document Requests. These deficiencies were the exact subject of Opposer's Motion to Compel [DE 5]. In a good faith effort to resolve this matter (again), undersigned counsel emailed Applicant requesting that he fully comply with the Board's Dec. 5, 2014 Order by amending Applicant's Supplemental Responses and actually producing the requested documents. A true and correct copy of the email to Applicant dated January 20, 2015 is attached as Exhibit 2 to the Alvarez Decl. As of the date of this filing, neither NTI nor its counsel has received any additional discovery responses or documents from Applicant. *See Exhibit B*, Alvarez Decl. In fact, there has been no communication from Applicant whatsoever in response to undersigned counsel's email dated Jan. 20, 2015. *Id.*

#### IV. ARGUMENT

Trademark Rule 2.120(g)(1) provides, in pertinent part: "If a party fails to comply with an order of the [Board] relating to disclosure or discovery ... the Board may make any appropriate order, including those provided in [FRCP] 37(b)(2), except that the Board will not hold any person in contempt or award expenses to any party." "Unlike a motion compel discovery, there is no requirement that a party make a good faith effort to resolve the parties' dispute prior to filing a motion for entry of discovery sanctions." *HighBeam Marketing, LLC v. HighBeam Research LLC*, 85 USPQ2d 1902, 1904 (TTAB 2008); *see* T.B.M.P. § 527.01(a). Further, in this case, the Board expressly warned Applicant in the First Order, and then in the Second Order, that if it failed to comply with the Board's Order that NTI's remedy would lie in a motion for sanctions under Trademark Rule 2.120(g)(1).

“The law is clear that if a party fails to comply with an order of the Board relating to discovery, including an order compelling discovery, the Board may order appropriate sanctions as defined in Trademark Rule 2.120(g)(1) and Fed.R.Civ.P 37(b)(2), including entry of judgment.” *MHW Ltd. V. Simex, Aussenhandelsgesellschaft Savelsberg KG*, 59 USPQ2d, 1477, 1478 (TTAB 2000) (citing *Baron Philippe de Rothschild S.A. v. Styl-Rite Optical Mfg. Co.*, 55 USPQ2d 1848, 1854 (TTAB 2000)).

In this case, there is no question that Applicant has failed to fully comply with the substance of the Board’s Order dated December 5, 2014. Applicant’s Supplemental Responses are virtually identical to Applicant’s initial discovery responses and fail to include ANY documents. Accordingly, having previously and repeatedly (in the First and Second Order) warned Applicant of sanctions in the event of noncompliance, entry of judgment is an appropriate sanction for Applicant’s failure to fully comply with the Board’s December 5, 2014 Order.

#### **V. THE BOARD SHOULD SUSPEND PROCEEDINGS**

Discovery in this matter closed on December 29, 2014. Yet NTI has no responsive documents and virtually no responses. Applicant has conducted zero discovery in this matter. Without discovery, any deposition of Applicant is essentially meaningless. Further, in the event the Board does not grant the relief sought by Opposer in this motion, NTI cannot realistically proceed to summary judgment or trial until the Board determines an appropriate sanction. Therefore, NTI requests that proceedings be suspended pending determination of this Motion. If the Board does not enter judgment in the favor of NTI, then NTI requests that the discovery period be reset for NTI only to provide a reasonable time (at least 30 days from any deadline for actual receipt of responsive documents or other information) for NTI to take depositions. *See*

*Amazon Technologies, Inc. v. Wax*, 95 USPQ2d 1865, 1869 (TTAB 2010) (imposing sanctions on oppose and reopening “discovery period for applicant only.”).

**VI. CONCLUSION**

Accordingly, NTI respectfully requests that the Board grant this Motion by: (1) entering judgment in NTI’s favor on all counts of its Notice of Opposition; (2) refusing to register United States Trademark Application Serial No. 85,920,599 for the mark BENNY HUNNA; and (3) granting such other relief as the Board deems appropriate.

Dated: January 29, 2015

/s/ Stephanie C. Alvarez /  
Janet C. Moreira, Esq.  
Stephanie C. Alvarez, Esq.  
**MAVEN Intellectual Property**  
333 S.E. 2<sup>nd</sup> Ave, Suite 2000  
Miami, FL 33131  
E-mail: [janet@maveniplaw.com](mailto:janet@maveniplaw.com)  
E-mail: [stephanie@maveniplaw.com](mailto:stephanie@maveniplaw.com)  
Local: 305.967.7450  
Toll Free: 855.63MAVEN (636.2836)

Counsel for Opposer Noodle Time, Inc.

**CERTIFICATE OF ELECTRONIC TRANSMISSION**

The undersigned hereby certifies that this document is being transmitted electronically through ESTTA pursuant to 37 C.F.R. § 2.195(a) on **January 29, 2015**

/s/Stephanie C. Alvarez /  
Stephanie C. Alvarez

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing document has been served on all counsel and/or parties of record via electronic mail transmission on January 29, 2015 as follows:

**By Email: [bennyhodge25@yahoo.com](mailto:bennyhodge25@yahoo.com)**  
Benny Hodge  
122 Country Club Drive  
Greenwood, MS 38930

/s/Stephanie C. Alvarez/  
Stephanie C. Alvarez

**EXHIBIT A**

***BNC's Notice of Voluntary Dismissal Without Prejudice***

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

---

BENIHANA NATIONAL CORP., a  
Delaware corporation,

Plaintiff,

CIVIL ACTION

No. 4:14-cv-00178-SA-JMV

vs.

BENNY HODGE, an individual, d/b/a  
BENNY HUNNA

Defendant.

---

**NOTICE OF VOLUNTARY DISMISSAL**

---

Plaintiff, Benihana National Corp., by and through undersigned counsel, pursuant to Fed. R. Civ. P. (41)(1)(a), hereby gives notice of its voluntary dismissal without prejudice of its Complaint filed in this case.

/s/ Brett A. Schubert

(MS B.P.R. No. 102005)

**Martin, Tate, Morrow & Marston, P.C.**

6410 Poplar Avenue, Suite 1000

Memphis, TN 38119-4839

Tel: 901.522.9000

Fax: 901.527.3746

E-mail: [sheawellford@martintate.com](mailto:sheawellford@martintate.com)

*Attorneys for Plaintiff*

*Benihana National Corp.*

**CERTIFICATE OF SERVICE**

The is to certify that a copy of the foregoing was electronically filed this day with the Clerk of the Court using the CM/ECF system and served via U.S. Mail, first class postage prepaid, addressed to the following on January 27, 2015:

Mr. Benny Hodge  
122 Country Club Drive  
Greenwood, MS 38930

Mr. Benny Hodge  
5260 Catspaw Drive  
Antioch, TN 37014

/s/ Brett A. Schubert

---

**EXHIBIT B**

*Declaration of Stephanie C. Alvarez, Esq.*

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD**

**NOODLE TIME, INC.,**  
Opposer,

**Opposition No.: 91214649**

v.

Mark: **BENNY HUNNA**  
Serial No.: 85/920,599  
Filing date: May 1, 2013  
Publication Date: October 8, 2013

**BENNY HODGE,**  
Applicant.

\_\_\_\_\_ /

**DECLARATION OF STEPHANIE C. ALVAREZ, ESQ.**

1. The matters set forth herein are based on my personal knowledge and are true and correct.
2. I am an attorney and of-counsel to MAVEN Intellectual Property.
3. I make this declaration in support of NTI's Motion for Entry of Judgment as Sanctions for Applicant's Failure to Fully Comply with the Board's Order dated December 5, 2014 and to Suspend Proceedings.
4. On or about December 25, 2014, this law firm received Applicant's Supplemental Answers to First Set of Interrogatories and Product of Document Request ("Supplemental Responses"). A true and correct copy of Applicant's Supplemental Responses is attached as Exhibit 1.
5. No documents were produced with Applicant's Supplemental Responses.
6. By email dated January 20, 2015, undersigned counsel notified Applicant of the deficiencies in Applicant's Supplemental Responses. A true and correct copy of said email is attached hereto as Exhibit 2.
7. As of the filing date of this Declaration, neither I nor this law firm has received

any additional discovery responses or documents from Applicant. Neither I nor this law firm has received any other communications from Applicant in response to undersigned counsel's email dated January 20, 2015.

8. I declare under the penalty of perjury and the laws of the United States that the foregoing is true and correct this 29<sup>th</sup> day of January, 2015.

/s/Stephanie C. Alvarez/  
Stephanie C. Alvarez, Esq.

**EXHIBIT 1**

***Applicant's Supplemental Responses***

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Mark: BENNY HUNNA

Serial No: 85/920,599

Filing date: May 01, 2013

Publication Date: October 08, 2013

NOODLE TIME, INC. vs. BENNY HODGE

Opposition No. 91214649

**APPLICANT'S SUPPLEMENTAL ANSWERS TO FIRST SET OF INTERROGATORIES**

**AND PRODUCTION OF DOCUMENT REQUEST**

Pursuant to Rule 26, Rule 33 and Rule 37 CFR Section 2.120, Applicant, BENNY HODGE respectfully submits the following Supplemental Answers To First Set Of Interrogatories And Production Of Document Request.

**INTERROGATORIES AND SUPPLEMENTAL ANSWERS**

1. Identify with particularity each specific product of service (not just the general description as set forth by Applicant in its federal application) which Applicant's Subject Mark is used, intended to be used, associated with or alluded to be associated with or alluded to be associated with.

Answer: The Applicant's Subject Mark has not been used. The Applicant's Subject Mark is intended to be used for Entertainment services in the nature of live musical performances, International Class Code: 041, US Class Code: 100, 101, and 107, Primary Class: Education; providing of training; entertainment; sporting and cultural activities.



**2.** State the date Applicant claims the date of first use of the Subject Mark for each product or service identified in Interrogatory No. 1.

Answer: Applicant has not made first use of Subject Mark anywhere or made first use of Subject Mark in commerce for each product or service identified In Interrogatory No. 1.

**3.** Describe in full and complete detail what efforts, if any, Applicant, or anyone connected to Applicant, has made use of the Subject Mark.

Answer: Applicant or anyone connected to Applicant has made no efforts to use the Subject Mark in commerce.

**5.** State Applicant's yearly dollar volume of sales for every year since first use of each product of service identified in Interrogatory No. 1.

Answer: Applicant has not made first use of Subject Mark in commerce. Applicant states that Applicant's yearly dollar volume of sales is zero dollars.

**6.** State Applicant's yearly expenditures for every year within the last five years with respect to the advertising and marketing of products and services identified in Interrogatory No. 1.

Answer: Applicant's yearly expenditures with respect to the advertising and marketing of products and services indented in interrogatory No. 1 are zero dollars.

**7.** Identify all types of media (including, but not limited to, newspapers, magazines, trade journals, direct mail advertising, radio, television, and the Internet) in which Applicant has advertised and intends to advertise each product and service offered or to be offered in connection with the Subject Mark.

Answer: Applicant as of now advertised and intends to advertise each product and services offered or to be offered in connection with the Subject Mark via internet.

**8.** Identify each person who has, claims to have, or whom you claim or believe may have knowledge, documents, or information pertaining to any fact alleged in the pleadings filed in this matter or any fact underlying the subject matter of this dispute and state the specific nature and substance of the knowledge, documents, or information you believe that each person identified in response to this request has or may have and identify all documents responsive to this interrogatory to this request.

Answer: Applicant/Benny Hodge and Opposer/Noodle Time Inc., to the best of Applicants knowledge, has knowledge, documents, or information pertaining to any fact alleged in the pleadings filed in this matter. All other persons with knowledge which are not specific individuals are named with address, phone numbers and subject information which was served to Opposer in Applicant's Initial Disclosure.

**11.** Identify each geographic area and location in the United States in which Applicant, or others under the authority of applicant has advertised or promoted the products and services connected with the Subject Mark. With respect to each advertisement or promotion identify:

(a) The date of the advertisement;

(b) If a printed advertisement, the name of the publication in which the advertisement appeared;

(c) If a billboard, the street address at which the billboard appeared;

(d) If a broadcast television or radio advertisement, the name of the station, whether radio or television, upon which the advertisement was broadcast, and

(e) Identify all documents relating to such advertising or promotion.

Answer: Applicant has advertised and promoted “Benny Hunna” by sharing and posting Youtube videos of Benny Hunna via the internet and social media daily.

### **DOCUMENT REQUESTS ANSWERS AND REASON TO RECONSIDER**

1. All documents referring to or evidencing the date you first used the Subject Mark.

ANSWER: Applicant does not have documents referring to or evidencing the date of first use.

The Subject Mark has not been used in commerce.

2. All document referring to or evidencing the date of your first sale of any items containing the Subject Mark.

ANSWER: Applicant does not have documents referring to or evidencing the date of Applicant’s first sale of any items containing the Subject Mark. The Subject Mark has no sales.

3. All documents sufficient to identify all products and/or services using the Subject Mark.

ANSWERS: The Subject Mark is intended to be used for Entertainment services in the nature of live musical performance. Opposer's has documents of Applicants intent to use application.

4. All documents sufficient to identify all trade channels through which you sell, advertise, promote or offer to sell, advertise or promote any products and/or services using the Subject Mark.

ANSWERS: The Subject Mark has no sales and is not offered to be sold. The Subject Mark is promoted and advertised at URL

<https://www.youtube.com/channel/UCrTqkOargZoEXYzwomfJ3dA>

<https://www.facebook.com/benny.hunna1>

<https://www.twitter.com/H2HUNNA>

[https://www.linkedin.com/profile/view?id=347046776&trk=nav\\_responsive\\_tab\\_profile](https://www.linkedin.com/profile/view?id=347046776&trk=nav_responsive_tab_profile)

9. All documents evidencing or relating to any communication between you and ABC News.

ANSWER: There are no documents evidencing or relating to any "communication" between Applicant and ABC News. All documents were given to Opposer pertaining to ABC News that were available to Applicant in a URL in Initial Disclosures.

10. All documents evidencing or relating to any communication between you and Interscope Records.

ANSWER: There are no documents evidencing or relating to any “communication” between Applicant and Interscope Records. All documents were given to Opposer pertaining to Interscope Records that were available to Applicant in a URL in Initial Disclosures.

11. All documents evidencing or relating to any communication between you and “Chief Keef”.

ANSWER: There are no documents evidencing or relating to any “communication” between Applicant and “Chief Keef”. All document were given to Opposer pertaining to Chief Keef that were available to Applicant in a URL in Initial Disclosures.

12. All documents evidencing or relating to the copyright registration of “3Hunna by Chief Keef of Interscope Records.”

ANSWER: All documents were given to Opposer in a URL in the Applicant’s Initial Disclosures.

14. All documents sufficient to identify all persons with knowledge of information and/or document supporting or contradicting the factual allegations of the Opposition.

ANSWER: Applicant has no documents sufficient to identify all persons with knowledge of information and/or documents supporting or contradicting any allegations of the Opposition..

15. All documents referring or relating to Opposer and/or Opposer’s Marks.

ANSWER: To the best of Applicant’s knowledge Opposer is in possession of all document’s referring or relating to Opposer’s Mark and Applicant only possesses documents Opposer has made available in the foregoing Opposition.

Date: December 25, 2014

12/25/2014

**X** BENNY HODGE

---

Benny Hodge  
Defendant

Benny Hodge

122 Country Club Dr.

Greenwood, MS 38930

Tel: (662)897-8525

E-mail: [bennyhodge25@yahoo.com](mailto:bennyhodge25@yahoo.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing Applicant's Supplemental Answers to First Set of Interrogatories and Production of Document Requests has been served on Opposer in the following manner:

By E-Mail

Janet C. Moreira

MAVEN INTELLECTUAL PROPERTY

5801 Biscayne Blvd.

Miami, Florida 33137

[janet@maveniplaw.com](mailto:janet@maveniplaw.com)

**EXHIBIT 2**

*Email Dated January 20, 2015*

## Stephanie C. Alvarez

---

**From:** Stephanie C. Alvarez  
**Sent:** Tuesday, January 20, 2015 11:23 AM  
**To:** 'bennyhodge25@yahoo.com'  
**Cc:** Janet C. Moreira  
**Subject:** NTI v. Benny Hodge, Opposition No. 91214649 - Applicant's Deficient Supplemental Responses  
**Attachments:** Final Ltr - Inadquate Discovery Responses.pdf  
**Importance:** High

Dear Mr. Hodge:

We have reviewed Applicant's Supplemental Answers to First Set of Interrogatories and Production of Document Request ("Supplemental Responses") which were served on December 25, 2014. We find the Supplemental Responses to be in violation of the Board's Order dated Dec. 5.

Applicant's Supplemental Responses are virtually identical in substance to Applicant's first set of discovery responses and fail to include **ANY** documents. As a result, Applicant's Supplemental Responses continue to be inadequate and inaccurate for the reasons detailed in our July 29, 2014 letter to you outlining the deficiencies in your initial discovery responses. A copy of our July 29, 2014 letter is attached hereto.

Moreover, we note that you have continued to "promote" the mark BENNY HUNNA by producing and posting additional videos online (Aug. 7, 2014) but have failed to produce any documents or videos in response to Opposer's written discovery.

We hereby request that you amend and supplement your Supplemental Responses and produce the requested documents, including copies of any and all videos that you have posted online. If we do not receive the requested information and documents by **5:00 p.m. EST on Monday, Jan. 26, 2015**, we will file a Motion for Sanctions with the Court.

Sincerely,

Stephanie Alvarez

*Stephanie C. Alvarez, Esq.*

Of Counsel to Maven

**MAVEN Intellectual Property**

333 S.E. 2nd Avenue, Suite 2000

Miami, FL 33131

Web: [www.maveniplaw.com](http://www.maveniplaw.com)

E-mail: [stephanie@maveniplaw.com](mailto:stephanie@maveniplaw.com)

Local: 305.967.7450

Toll Free: 855.63MAVEN