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

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|------------------------|---|
| Proceeding | 91225643 |
| Party | Plaintiff Hachette Filipacchi Presse |
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| Signature | /ghf/ |
| Date | 01/04/2016 |
| Attachments | Replacement Notice of Opposition with competed Certificate of Service.pdf(902870 bytes) |

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

In the Matter of Application Serial No. 86/540,377
Published in the *Official Gazette* on July 7, 2015

| | | |
|-----------------------------|---|-----------------------------|
| HACHETTE FILIPACCHI PRESSE, | : | Opposition No. _____ |
| | : | |
| Opposer, | : | |
| | : | |
| v. | : | NOTICE OF OPPOSITION |
| | : | |
| DANIELLE KLEHA, | : | |
| | : | |
| Applicant. | : | |

Opposer Hachette Filipacchi Presse, a French corporation with a principal place of business at 149, Rue Anatole France, Levallois-Perret Cedex, 92534, France (“Opposer”), believes that it would be damaged by the issuance of a registration for the trademark DANIELLE (“Applicant’s Mark”) as applied for in Application Serial No. 86/540,377 (the “Application”) filed on February 19, 2015 by Dani Elle Kleha (“Applicant”), and therefore opposes registration of same under Section 13 of the U.S. Trademark Act, 15 U.S.C. § 1063.

The grounds for the opposition are:

1. On February 19, 2015, Applicant filed the Application for “Shirts” in Class 25 and “Entertainment services by a musical artist and producer, namely, musical composition for others and production of musical sound recordings; Entertainment services in the nature of presenting live musical performances” in Class 41. The Application was filed based on use in commerce and claims a first use date of January 1, 2004 and a first use in commerce date of January 1, 2004 for both the Class 25 goods and Class 41 services.

2. The Application was published for opposition in the Official Gazette on July 7, 2015.

3. Opposer timely filed two requests to extend the deadline for opposing the Application. Opposer's Notice of Opposition is timely filed.

4. Opposer is the owner of the world famous brand ELLE.

5. *ELLE* magazine was launched in the United States in 1985. *ELLE* is said to be the world's largest fashion magazine, with 46 international editions in over 60 countries, and 23 million readers globally. *ELLE* print and digital magazines features extensive coverage (e.g., articles, photography and advertisements) of fashion, celebrities, apparel, jewelry, film, television, arts and entertainment. *ELLE* magazine and the ELLE brand are extensively promoted on the Internet, via social networking sites, at newsstands and elsewhere, and enjoy substantial sales and reputation.

6. *ELLE* magazine has been regularly distributed in the United States since its launch in 1985. The U.S. edition of *ELLE* magazine is widely circulated in print, with over 1.125 million copies sold monthly for a reach of nearly 5.6 million readers. *ELLE* magazine is also digitally available on Opposer's ELLE.com website, which receives over 4.6 million unique visitors for a total of approximately 25 million pages viewed each month, and, since at least as early as September 2010, on Apple and Android tablets through an ELLE application. ELLE's application reaches over 40,000 readers each month. Opposer's ELLE electronic newsletter is circulated weekly to its 130,000 subscribers.

7. Not only is Opposer's mark ELLE famous as a magazine publication, both in print and digital forms, but also more generally in the fashion, music and entertainment fields, with a strong diversification of the trademark for a wide range of goods and services. The ELLE mark has been extensively used in connection with such goods as clothing and accessories, shoes, the online publication of books and magazines, providing a website featuring information

in the field of music and articles in the field of entertainment, cosmetics, perfumes, home goods, furniture, electronic applications and goods, including videos, electronic publications, jewelry, hair accessories, watches, eyewear, bags and giftware advice as a natural extension of *ELLE* magazine's focus on fashion, shopping, beauty, pop culture, music, film, entertainment, art and celebrities. Opposer owns a number of United States Registrations for the trademark ELLE covering clothing, including Registration Nos. 0862001, in use since March 22, 1949 and in use in commerce since March 22, 1965, covering "dresses, skirts, jackets, coats, sweaters, bathing suits, caps, gloves."

8. The ELLE mark has also established a strong presence on the Internet through numerous websites, including, but not limited to, www.elle.com and www.ellecanada.com, each of which has millions of visitors per month. For example, the elle.com website features videos and film clips in the fields of fashion and accessories, hair and beauty, pop culture, film, news, life and love, shopping, and other topics of interest, plus links to third-party videos. The elle.com site also offers a video platform with eight channels, which include fashion, celebrity and runway features. Consequently, Opposer's ELLE mark enjoys great media presence.

9. As a natural extension of its role in the fashion industry with expertise on the latest fashion trends, the ELLE mark has been used extensively in connection with clothing and apparel. Opposer has used the ELLE mark in commerce since at least as early as 1945 and since at least as early as March 22, 1965 in connection with clothing.

10. The ELLE mark has also been used in connection with entertainment related services and promotions. Among these many activities are the ELLE Style Awards, which have been awarded almost annually since 2002, and the ELLE Women in Music event, which honors some of the top female entertainers. In Fall 2014, Opposer sponsored its 21st annual ELLE

Women in Hollywood event, honoring some of the top female film actresses. These events are widely reported in internationally distributed media such as the *Hollywood Reporter*, *Variety*, *Celebrity Gossip*, *The Los Angeles Times*, *The Huffington Post*, *The Denver Post*, *YouTube* and, of course the various platforms for *ELLE* magazine and other widely distributed publications and websites.

11. The ELLE brand has been extensively promoted and advertised for magazines and various merchandise related to fashion, celebrity style, jewelry, film, arts, entertainment, beauty. As a result of Opposer's efforts, Opposer's ELLE-branded magazines and merchandise have resulted in annual sales of millions of dollars in the United States. The ELLE mark has become distinctive of Opposer's goods and services, and Opposer's ELLE mark has come to represent enormous goodwill for Opposer.

12. The ELLE mark is universally recognized as a distinct brand associated with inspiring women and girls to create and embrace their own style as well as other positive values in modern society.

13. The Trademark Trial and Appeal Board has determined that Opposer's mark ELLE "is famous in connection with its magazine and within the fashion industry generally, and is entitled to broad protection." *Hachette Filipacchi Presse v. Ev Int'l, LLC*, Opposition No. 91174433 (Sept. 5, 2008).

14. Opposer owns numerous registrations and applications for its family of ELLE-formative marks covering, as listed below, various goods and services (collectively, "Opposer's Goods and Services"), including the following (collectively, the "Opposer's Marks"):

| Mark | Reg. No./ Serial No. | Reg. Date/ Filing Date | Goods / Services |
|---------|-------------------------|---------------------------|---|
| ELLE | 0758137 | Oct. 8, 1963 | Class 16: Magazines |
| ELLE | 0861159 | Nov. 26, 1968 | Class 35: Promoting the sale of women's apparel by others by staging style shows and by the preparation of various types of advertising |
| ELLE | 0862001 | Dec. 17, 1968 | Class 25: Dresses, skirts, jackets, coats, sweaters, bathing suits, ties, scarves, caps, gloves |
| ELLE | 1454808 | Sept. 1, 1987 | Class 3: Toiletries and cosmetics, namely perfumes; toilet water; essential oils; skin and bath lotions; toilet soaps; body lotions lipstick; skin moisturizing lotion; bath gels and oils |
| ELLE | 1454393 | Aug. 25, 1987 | Class 25: Lingerie |
| ELLE | 1571639 | Dec. 19, 1989 | Class 9: Adding machines and calculators |
| E L L E | 1943456 | Dec. 16, 1995 | Class 14: jewelry, such as earrings, necklaces, rings, horological and chrometric instruments, namely, watches |
| E L L E | 1322177 | Feb. 26, 1985 | Class 18: ((Umbrellas;)) Articles Made of Leather, Imitation Leather and Canvas-Namely, Luggage, Tote Bags, Hand Bags, ((Beach Tote Bags,)) Shoulder Bags, Cosmetic Bags Sold Empty, Shopping Tote Bags |
| E L L E | 1318319 | Feb. 5, 1985 | Class 26: Earrings of nonprecious metal |
| E L L E | 1419815 | Dec. 9, 1986 | Class 9: Spectacles |
| E L L E | 1421118 | Dec. 16, 1986 | Class 22: Bags for storage; sacks of textile for packaging |
| E L L E | 1429609 | Feb. 17, 1987 | Class 42: News agency services- namely, gathering and disseminating news by electronic |

| Mark | Reg. No./ Serial No. | Reg. Date/ Filing Date | Goods / Services |
|------------|-------------------------|---------------------------|---|
| | | | transmission |
| E L L E | 1314558 | Jan. 15, 1985 | Class 16: Stationery-Namely, Notebooks, Writing Pads, ((Fountain Pens,)) Pencils,((Pencil Holders, Indexes, Stationery Portfolios,)) Notebooks/Writing Pads ((, Address Books, Folders)) |
| E L L E | 1348158 | July 9, 1985 | Class 25: Footwear-namely, shoes |
| ELLEDECOR | 1668272 | Dec. 17, 1991 | Class 16: Printed matter and periodicals, namely, newspapers, reviews, pamphlets, brochures, newsletters, information or advertising letters, journals and magazines in the fields of interior and exterior decorating, architecture, landscaping, gardening and horticulture; cuisine Class 41: Publication of books, magazines, and newspapers |
| ELLE DECOR | 1732988 | Nov. 17, 1992 | Class 16: Magazines featuring interior and exterior decorating, architecture, landscaping, gardening and horticulture; cuisine; art and sculpture, artifacts, antiques and collections, furniture; household accessories, accoutrements, and fixtures; critiques of residences; biographical sketches; electronics for the home; national and international lifestyles, travel, tourism and photography |
| ELLE | 2120688 | Dec. 16, 1997 | Class 35: Offering technical assistance in the establishment and/or operation of fashion shows and beauty pageants, beauty salons and fashion wear boutiques Class 42: Providing consulting to others in the fields of beauty, health and fashion wear; consulting services in the field of cooking; providing social clubs; editing written texts for |

| Mark | Reg. No./ Serial No. | Reg. Date/ Filing Date | Goods / Services |
|---------|-------------------------|---------------------------|---|
| | | | others; setting up and compiling data banks; mail order services rendered by a clothing boutique |
| E L L E | 2199132 | Oct. 27, 1998 | Class 9: Data bases containing stored information in the field of music, theater, cinema, literature, arts, education, home decoration, gardening, landscaping, culinary arts, fashion and beauty to be read/consulted and or used on computer terminals and video equipment; compact discs, and audio and/or video discs featuring themes such as music, theater, cinema, literature, arts, education, home decoration, gardening, landscaping, culinary arts, fashion and beauty |
| ELLE | 2242315 | May 4, 1999 | <p>Class 38: Telephone communications services; electronic transmission of data, images and sounds and documents via computer terminals; electronic transmission of information from data banks via computer terminals</p> <p>Class 41: Forums in the field of fashion and beauty; entertainment services, namely, providing an on-line entertainment variety show, featuring fashion and beauty</p> <p>Class 42: Licensing of intellectual property; editing of written texts, book reviews, periodicals, magazines and publications of all types regardless of their form, including electronic and digitalized publications, compiling data bases and data banks for use by others</p> |
| E L L E | 2560906 | Apr. 16, 2002 | Class 31: Natural agricultural products, namely, living, natural flowers, rose bushes |
| ELLE | 2708222 | Apr. 22, 2003 | <p>Class 9: Spectacles</p> <p>Class 25: Footwear - namely, shoes, boots, sandals and clogs</p> |

| Mark | Reg. No./ Serial No. | Reg. Date/ Filing Date | Goods / Services |
|---------|-------------------------|---------------------------|---|
| E L L E | 2914032 | Dec. 28, 2004 | <p>Class 3: beauty and cosmetic products, namely, cosmetics creams, cosmetic preparations for skin care</p> <p>Class 21: ((hair brushes,))</p> |
| ELLE | 4284558 | Feb. 5, 2013 | <p>Class 9: (Based on 44(e)) Video recordings featuring music, theater, cinema, literature, arts, as well as home decoration, gardening, landscaping, culinary arts, fashion and beauty</p> <p>Class 38: (Based on Use in Commerce) Transmission and broadcast of images, sounds, data, information by computer terminals; providing user access to a global computer network; interactive communication services, namely, interactive delivery of video over digital networks, transmission of sound and vision via satellite or interactive multimedia networks; information transmission services via digital networks designed for public information; communications on computer networks in general; transmission of information by electronic means; providing discussion forums on the Internet; virtual chat rooms established via text messaging; instant messaging services; wireless electronic transmission of voice signals, data, facsimiles, images and information (Based on 44(e)) Television and radio broadcasting services, including cable transmissions of such services; communication services, namely, cable television transmission services; transmission and broadcast of images, sounds, data, information by cable, by data communications channel, namely, cable, satellite and fiber optics and via telecommunication networks, wireless communication networks and the internet; broadcasting of radio and television programs; providing online forums for transmission of</p> |

| Mark | Reg. No./ Serial No. | Reg. Date/ Filing Date | Goods / Services |
|------|-------------------------|---------------------------|--|
| | | | <p>messages in the fields of literature, education, home decoration, publication of books.</p> <p>Class 41: (Based on Use in Commerce) Online publication of books, periodicals, newspaper, magazines, illustrations; providing an online magazine featuring information in the fields of fashion, beauty, entertainment, cooking, music, theater, cinema, literature, arts, education, home decoration, gardening, landscaping; entertainment services, namely, providing an online service featuring photographs, and other multimedia materials in the fields of entertainment, music, theater, cinema, literature, arts, and education; providing a web site featuring information in the fields of music, and commentary and articles of general interest issues in the fields of entertainment and games; (Based on 44(e)) Entertainment in the nature of beauty pageants; production of television programs; entertainment services in the nature of a cable television variety show featuring fashion and beauty; video tape film production; services for the public entertainment, namely, organization of shows for cultural purposes; organization of conferences, forums, congresses, colloquiums in the fields of fashion, beauty, entertainment, cooking, music, theater, cinema, literature, arts, education, home decoration, gardening, landscaping, media for non business purposes; production and editing of movie, radio and television programs, including computer editing of texts and still or animated images and musical or non-musical sound, for interactive use or not; organization of sports competitions and arranging and conducting competitions in the fields of fitness and exercise, fashion, beauty, entertainment, cooking, music, theater, cinema, literature, arts, child and</p> |

| Mark | Reg. No./ Serial No. | Reg. Date/ Filing Date | Goods / Services |
|------|-------------------------|---------------------------|--|
| | | | <p>adolescent educational issues, home decoration, gardening, landscaping, and media; organization of games and lotteries; production and editing of radio information and entertainment programs. entertainment services, namely, providing on-line computer games; providing a web site featuring non downloadable musical performances, musical videos, video recordings and related film clips; assisting others with online electronic publishing; providing of information via the Internet in the fields of literature and education; publication of books; publishing of illustrations, books, newspapers, and video-cassette tapes.</p> <p>Class 42: (Based on Use in Commerce) Computer services, namely, interactive hosting services which allow the user to publish and share their own content and images online; providing search engines on the Internet; hosting a website allowing users to download texts, press articles, photographs, telegrams, pictures, logos, messages, data, sounds, ringtones, music, games, video, and information; providing customer-generated content in the nature of customized web pages and other data feed formats featuring user-defined information; hosting digital content of others automatically selected and customized based on the known or estimated geographical location of an Internet, mobile telephone or other wired or wireless digital network based customer; (Based on 44(e)) providing a website allowing users to upload and download electronic files; computer programming services; creating and designing web pages for others; providing search platforms to allow users to request content from and receive content to a mobile device; design, development and hosting of data banks, databases and websites for others; providing of information via the</p> |

| Mark | Reg. No./ Serial No. | Reg. Date/ Filing Date | Goods / Services |
|------|-------------------------|---------------------------|--|
| | | | <p>Internet in the field of home decoration; providing an online service featuring photographs, and other multimedia materials in the field of home decoration.</p> <p>Class 44: (Based on Use in Commerce) Providing a web site featuring information in the field of beauty; providing an online service featuring photographs, and other multimedia materials in the field of beauty.</p> <p>Class 45: (Based on Use in Commerce) Providing a web site featuring information and content in the fields of personal relationships, dating and fashion; providing horoscope information via computer networks; providing an online service featuring photographs, and other multimedia materials in the field of fashion.</p> |

Copies of the certificates of registrations for Opposer's Marks are attached as Exhibit A and made of record.

15. Each of Opposer's Marks is valid, subsisting and in full force and effect.

16. Each of Opposer's Marks is at least *prima facie* evidence of the validity of each registration, of Opposer's ownership thereof, and of Opposer's exclusive right to use such registered marks on the goods or services set forth in the registration.

17. Registration Nos. 0758137, 0861159, 0862001, 1314558, 1318319, 1322177, 1348158, 1419815, 1429609, 1454393, 1454808, 1571639, 1668272, 1732988, 1943456, 2120688, 2199132, 2242315, 2560906, 2708222 and 2914032 are incontestable pursuant to Section 15 of the U.S. Trademark Act, 15 U.S.C. § 1065, and thus serve as conclusive evidence of the validity of Opposer's Marks pursuant to 15 U.S.C. § 1115(b).

18. As of Applicant's filing of the Application on February 19, 2015, Applicant was on constructive notice of Opposer's Marks and Opposer's rights in Opposer's Marks as set forth in the registrations for Opposer's Marks and, on information and belief, was on actual notice of Opposer's use of and rights in the ELLE mark, including in connection with the promotion of goods and services bearing the ELLE label in the fields of fashion, fashion accessories, arts, film, television, entertainment, music, lifestyle, beauty and hygiene, given the fame of the ELLE mark in the magazine publishing, fashion and entertainment, and beauty industries.

19. Opposer's rights as conferred by Opposer's Marks were in effect prior to any filing date or date of first use upon which Applicant can rely.

20. Applicant's Mark is confusingly similar to Opposer's Marks and is proposed to be applied to goods and services that either are identical or similar and closely related to the goods and services offered and sold by Opposer under Opposer's Marks. Applicant's Mark so closely resembles Opposer's Marks as to be likely to be confused therewith and mistaken therefor. Applicant's Mark is deceptively similar to Opposer's Marks so as to cause confusion and lead to deception as to the origin of goods bearing Applicant's Mark.

21. Upon information and belief, goods and services made in relation to Applicant's Mark will be promoted and sold or offered for sale through the same distribution channels and to the same classes of consumers as goods and services bearing Opposer's Marks.

22. Applicant's Mark suggests an affiliation, connection or sponsorship between Applicant and Opposer, where none exists.

23. Opposer is not affiliated or connected with Applicant; nor has Opposer endorsed or sponsored Applicant.

24. If Applicant is permitted to register Applicant's Mark, the registration will give Applicant a *prima facie* exclusive right to the use of Applicant's Mark in violation and derogation of the established prior rights of Opposer.

**FIRST CLAIM FOR RELIEF
LIKELIHOOD OF CONFUSION**

25. Opposer incorporates by reference Paragraphs 1 through 24, as if fully set forth herein.

26. Applicant's Mark is highly similar in sound, appearance and commercial impression to Opposer's Marks, since the dominant element of Applicant's mark is "ELLE," which is identical to Opposer's famous ELLE mark. In addition, Opposer co-brands the ELLE mark for products and services, and thus the additional wording "DANI-" could be viewed as denoting another line extension or co-branding project from Opposer.

27. Applicant's Mark is being used in connection with goods and services that are identical or closely related to the goods and services for which Opposer uses Opposer's Marks and any extension, and are promoted and sold or offered for sale in the same or similar channels of trade, to the same or similar purchasers.

28. Based on the similarities of the marks and the goods and services, the public is likely to associate the goods and services offered by Applicant under Applicant's Mark with Opposer or with Opposer's Goods and Services to believe that Applicant's goods are sponsored, endorsed or licensed by Opposer, or that there is some relationship between Applicant and Opposer.

29. The granting of a trademark registration for Applicant's Mark to Applicant would be contrary to Section 2(d) of the U.S. Trademark Act, 15 U.S.C. § 1052(d), and would violate or diminish the prior and superior rights of Opposer in Opposer's Marks.

30. The presumption of exclusivity that would arise from a registration to Applicant of Applicant's Mark is inconsistent with Opposer's prior rights in Opposer's Marks.

31. Opposer will be thus damaged by the registration of Applicant's Mark because such registration will support and assist Applicant in the confusing and misleading use of the Applicant's Mark and will give color of exclusive statutory rights to Applicant in violation and derogation of the prior and superior rights of Opposer.

**SECOND CLAIM FOR RELIEF
FALSE SUGGESTION OF A CONNECTION WITH OPPOSER**

32. Opposer incorporates by reference Paragraphs 1 through 31, as if fully set forth herein.

33. Applicant has no legitimate connection with Opposer and has no authority or permission to use a trademark suggesting such a connection.

34. Applicant's Mark is not registrable pursuant to Section 2(a) of the U.S. Trademark Act, 15 U.S.C. § 1052(a), because it falsely suggests a connection or affiliation with Opposer.

35. Opposer will be damaged by the registration of Applicant's Mark on the grounds that Applicant's use and registration of Applicant's Mark will falsely suggest a connection between Applicant and Opposer to the damage of Opposer and injury to the public, in violation of Section 2(a) of the U.S. Trademark Act, 15 U.S.C. § 1052(a).

**THIRD CLAIM FOR RELIEF
DILUTION**

36. Opposer incorporates by reference Paragraphs 1 through 35, as if fully set forth herein.

37. Opposer's ELLE mark is inherently distinctive and has been used in commerce since 1945 in connection with *ELLE* magazine, March 22, 1965 in connection with clothing and

1996 in connection with the website www.elle.com, long before any date on which Applicant may rely. The ELLE mark is famous in the fashion industry. As used as the title of the magazine *ELLE* and in connection with the website www.elle.com, the ELLE mark is also renowned in the beauty, arts, entertainment and music fields. The ELLE mark is also well-known via its use on labels that are attached to all ELLE goods all over the world, its branded social networking sites, and its use in electronic applications and goods, including television and video broadcasts shown on the www.elle.com website and online publications. The ELLE mark is the subject of numerous federal trademark registrations, a number of which are incontestable. In view of the strength and notoriety of the ELLE mark, the duration and extent of Opposer's nationwide use and advertising of the ELLE mark, and the degree of recognition of the ELLE mark, the mark ELLE is famous within the meaning of Section 43(c) of the U.S. Trademark Act, 15 U.S.C. § 1125(c).

38. Applicant's mark was adopted and the application at issue was filed long after Opposer's ELLE mark became famous.

39. Upon information and belief, Applicant applied to register Applicant's Mark with full knowledge of the prior use and fame of Opposer's Marks.

40. By virtue of the similarity between Applicant's Mark and the ELLE mark, the fame of the ELLE mark, and the exclusive association between the ELLE mark and Opposer, Applicant's Mark is likely to cause, and will cause, dilution of the distinctive value of Opposer's Marks under Section 43(c) of the U.S. Trademark Act, 15 U.S.C. § 1125(c).

41. Opposer will be damaged by the registration of Applicant's Mark because it will cause dilution of the distinctive quality of Opposer's Marks. Therefore, registration of Applicant's Mark should be refused under 15 U.S.C. §§ 1125(c) and 1063(a).

WHEREFORE, Opposer requests that this Opposition be sustained, and that the registration of U.S. Trademark Application Serial No. 86/540,377 be refused.

Dated: January 4, 2016

Respectfully submitted.

McCARTER & ENGLISH, LLP

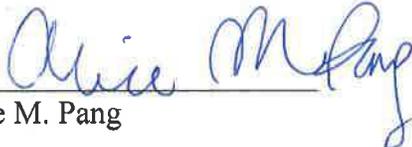
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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing NOTICE OF OPPOSITION has been served by First Class Mail, postage prepaid, on Applicant's attorney of record at the following address:

Noah C. McPike, Esq.
Almon & McPike, PLLC
1222 16th Ave S Ste 26
Nashville, Tennessee 37212-2926

Date: January 4, 2016



Alice M. Pang