

ESTTA Tracking number: **ESTTA923113**

Filing date: **09/19/2018**

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

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

| | |
|---------------------------------------|--|
| Name | Frungy Games, Inc. |
| Granted to Date of previous extension | 09/19/2018 |
| Address | 2553 Laguna Vista Drive Novato, CA 94945 UNITED STATES |

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| Correspondence information | Mark S. Palmer 4 Meadow Drive Mill Valley, CA 94941 UNITED STATES mark@palmerlex.com 4153367002 |
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Applicant Information

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|------------------------|--|------------------------|------------|
| Application No | 87697919 | Publication date | 05/22/2018 |
| Opposition Filing Date | 09/19/2018 | Opposition Period Ends | 09/19/2018 |
| Applicant | Stardock Systems, Inc. 15090 Beck Road Plymouth, MI 48170 UNITED STATES | | |

Goods/Services Affected by Opposition

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| Class 041. First Use: 2013/08/10 First Use In Commerce: 2013/08/10 All goods and services in the class are opposed, namely: Entertainment services, namely, providing on-line computer games; providing online information via the Internet and other computer and electronic communication networks on the subjects of computer games and computer game software |
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Grounds for Opposition

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| Priority and likelihood of confusion | Trademark Act Section 2(d) |
| The mark is merely descriptive | Trademark Act Section 2(e)(1) |
| The mark is generic | Trademark Act Sections 1, 2 and 45 |
| The mark comprises matter that, as a whole, is functional | Trademark Act Section 2(e)(5) |
| No use of mark in commerce before application or amendment to allege use was filed | Trademark Act Sections 1(a) and (c) |
| Applicant not rightful owner of mark for identified | Trademark Act Section 1 |

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| goods or services | |
| False suggestion of a connection with persons, living or dead, institutions, beliefs, or national symbols, or brings them into contempt, or disrepute | Trademark Act Section 2(a) |
| Deceptiveness | Trademark Act Section 2(a) |
| Fraud on the USPTO | In re Bose Corp., 580 F.3d 1240, 91 USPQ2d 1938 (Fed. Cir. 2009) |
| Other | Application made in bad faith |

Mark Cited by Opposer as Basis for Opposition

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|------------------------------------|--|------------------|------|
| U.S. Application/ Registration No. | NONE | Application Date | NONE |
| Registration Date | NONE | | |
| Word Mark | THE UR-QUAN MASTERS, STAR CONTROL | | |
| Goods/Services | Computer game programs downloadable via the Internet; Computer game programs; Computer game software; Game software; Video and computer game programs; Computer programs for video and computer games; Downloadable computer game programs; Interactive game software; Interactive video game programs | | |

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| Attachments | Notice of Opposition_STAR CONTROL-87697919_20180919.pdf(225727 bytes) |
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| | |
|-----------|-----------------|
| Signature | /Mark S Palmer/ |
| Name | Mark S. Palmer |
| Date | 09/19/2018 |

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

In the Matter of:
Application Serial No.: 87/697,919
Mark: STAR CONTROL
Published in the Official Gazette: May 22, 2018

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|-------------------------|---|-----------------------------|
| Frungy Games, Inc., |) | |
| |) | |
| Opposer, |) | |
| |) | |
| v. |) | Opposition No. _____ |
| |) | Appln. Serial No 87/697,919 |
| Stardock Systems, Inc., |) | |
| |) | |
| Applicants. |) | |
| |) | |

NOTICE OF OPPOSITION

Frungy Games, Inc., a Delaware corporation, located and doing business in California at 730 Eucalyptus Avenue, Novato CA 94947 (hereinafter “**Frungy**”), believing that it will be damaged by Applicants’ registration, hereby opposes registration of the mark shown in Application Serial No. 87/697,919 for the mark STAR CONTROL, filed November 27, 2017, under the Trademark Act of 1946, in the name of Stardock Systems, Inc., a Michigan corporation, located and doing business at 15090 Beck Road, Plymouth, Michigan 48170 (hereinafter “**Applicant**”), published for opposition in the *Official Gazette* of May 22, 2018 (the “**Opposed Mark**”).

The grounds for Opposition are as follows

1. Upon information and belief, Applicants filed, under Trademark Act § 1(a) claiming use of the mark in U.S. Commerce, U.S. Trademark Application No. 87/697,919 for the Opposed Mark for entertainment services, namely, providing on-line computer games; providing online information via the Internet and other computer and electronic communication networks on the subjects of computer games and computer game software.

2. Paul Reiche III (“**Reiche**”) and Robert Frederick Ford (“**Ford**”) (collectively, “**Reiche**”) founded and incorporated Frungy intending to develop and publish certain computer games, including their new game currently in development entitled “Ghosts of the Precursors”.

3. Frungy and Reiche are in privity and engaged in the development of the same or related products or services as the Opposed Mark and Frungy has an interest in using the term descriptively in its business and have standing to oppose registration of the Opposed Mark.

4. Ghosts of the Precursors is a direct sequel to Reiche’s original story embodied in two classic computer games originally called “Star Control” and Star Control II,” with the latter game more subsequently titled “Star Control II: the Ur-Quan Masters”, or at times alternatively “The Ur-Quan Masters.”

5. Star Control, Star Control II, and Reiche’s Preexisting Characters used in Star Control 3 as more specifically defined below, are hereinafter referred to collectively as the “Original Star Control Games.”

6. In 1988, Reiche initially licensed their games to be published by a company called Accolade, Inc. (“**Accolade**”) pursuant to a written license agreement (the “**1988 License Agreement**”).

7. The Original Star Control Games quickly acquired a cult status among

computer game enthusiasts, and ultimately grew to be regarded as some of the all-time classic and best computer games in history. Star Control and Star Control II: The Ur-Quan Masters were both successful in terms of sales and received substantial critical acclaim around the time of their release and in subsequent years. For example, in 1996, Computer Gaming World ranked Star Control II: The Ur-Quan Masters as the 29th best game of all time, and Star Control as the 127th best game of all time. More recently, in 2005, IGN named Star Control II: The Ur-Quan Masters the 17th best game of all time. Reviewers praised the graphics, dialogue, and quality of the gameplay, among other things. A few years ago, Star Control II: The Ur-Quan Masters emerged as the consistent favorite in a crowd-sourced list of the best PC games of all time: <https://kotaku.com/the-game-that-won-our-classic-pc-games-list-if-it-ha-1349952997>.

8. Effective February 1, 1995, Accolade and Reiche entered into Addendum No. 2 to the 1988 License Agreement, to allow Accolade to develop and publish “Star Control 3” without Reiche, but using “characters, names, likenesses, characteristics, and other intellectual property rights pertaining to Star Control I and Star Control II in which Reiche has an ownership interest” (hereinafter “**Reiche’s Preexisting Characters**”). Star Control 3 was arguably not as successful, nor as well-received as Star Control and Star Control II.

9. In April 1996, Accolade filed U.S. Trademark Registration No. 2,046,036 for STAR CONTROL for computer game software, and manuals supplied as a unit therewith (the “**1996 Star Control Registration**”).

10. By 2001, Accolade’s licenses from Reiche with respect to the Original Star Control Games under 1988 License Agreement and its Addenda had expired or were terminated and all previously granted rights reverted to Reiche.

11. Since at least 2001, Reiche has held the copyrights and the exclusive right to

publish and make derivative works from the Original Star Control Games and Reiche's Preexisting Characters incorporated into Star Control 3.

12. Beginning about 2001, Accolade abandoned its use of the STAR CONTROL mark as a trademark, along with all other common law marks that may have been used or associated with the Original Star Control Games and all those abandoned marks remained unused in commerce by Accolade, or any of its assigns, for more than a decade, and until at least 2011.

13. On August 1, 2002, having regained all rights to their games, Reiche released an open source edition of Star Control II: the Ur-Quan Masters derived from the 3DO version, which was distributed free to use in a non-commercial context (the "**Open Source Project**"). As Reiche could not reach agreement with Accolade to acquire or use the Star Control trademark rights, they released the game under just the name "The Ur-Quan Masters," with Accolade's knowledge and without their objection. Reiche has used the mark THE UR-QUAN MASTERS in commerce at least since then in connection with distributing the open source edition of Star Control II.

14. On November 25, 2002, Accolade assigned U.S. Trademark Registration No. 2,046,036 for STAR CONTROL to Infogrames, and on March 17, 2003, Infogrames filed with the United States Patent and Trademark Office ("**USPTO**") a Declaration of Use and Incontestability attaching a picture of the Star Control II packaging from 1994 as the Specimen of Use. On information and belief, this was a fraudulent statement to the USPTO because Accolade had not sold any Star Control game, including the pictured version of Star Control II, since at least 2000 and perhaps even earlier, as evidenced by the lack of royalty payments to Reiche. In or around May 2003, Infogrames was renamed Atari.

15. On September 18, 2007, Atari filed with the USPTO a Declaration of Use in

Commerce and Application for Renewal of Registration for the STAR CONTROL Mark. On information and belief, this was a fraudulent statement to the USPTO because Atari was not using the STAR CONTROL mark in interstate commerce at that time, nor had it done so since at least 2000. Further, on information and belief, Atari did not use the STAR CONTROL mark through at least early 2011.

16. On January 2, 2012 (with an effective date of April 1, 2011), Reiche entered into the Digital Distribution Agreement with GOG Limited (“**Reiche-GOG Agreement**”) to provide GOG with a non-exclusive license to distribute the Original Star Control Games, including the Preexisting Characters incorporated into Star Control 3.

17. On information and belief, in 2013 Atari filed for bankruptcy and put its assets up for auction, including the “Star Control Franchise” more specifically consisting only of “Star Control 3.” On information and belief, Atari purportedly sold its “Star Control Assets” to Applicant under a Purchase Agreement dated July 18, 2013. The Purchase Agreement defined the Purchased Assets as including the Intellectual Property identified on Schedule 1.01(a), the contracts listed on Schedule 2.01(b), and certain causes of action related to the Intellectual Property. Any other assets and properties of Atari were excluded from the Purchased Assets. The purported schedules of the Intellectual Property encompassed in the Purchased Assets, list the following intellectual property allegedly transferred from Atari to Applicant: a) U.S. Trademark Registration No. 2,046,036 for the STAR CONTROL Mark; and b) U.S. Copyright Registration No. PA 799-000 for Star Control 3. Atari did not purport to sell or license, nor did it even own or have the right to sell or license, any rights to Reiche’s Original Star Control Games or Reiche’s Preexisting Characters used in Star Control 3. Moreover, the 1988 License Agreement and Addendum No. 2 relating to Star Control 3 had terminated and expired over a decade earlier.

18. Although, Applicant purportedly acquired from Atari, a successor assignee of Accolade, certain trademark rights to the Star Control name and partial copyrights for the Star Control 3 sequel in 2013, the 1988 License Agreement with Reiche provided that the agreement could not be assigned by Accolade without Reiche's consent, and that it was binding on any permitted successors and assigns. Even if it could have been assigned, Reiche never consented to any assignment as required by the 1988 License Agreement and applicable law. The purported assignment to Applicant in 2013 was made without the required transfer of any associated rights to lawfully produce, distribute or create any substantially similar goods or services that were identified or associated with the abandoned 1996 Trademark Registration. The alleged assignment to Applicant in 2013 was invalid under applicable law.

19. Despite the purported assignment of Accolade's trademark and certain copyrights to Star Control 3 to Applicant, Applicant holds no right or license to publish or sell Star Control 3 incorporating Reiche's Preexisting Characters or to make any derivative works from the Original Star Control Games.

20. Over the past 30 years, consumers have come to identify "Star Control" and "The Ur-Quan Masters" with Reiche as the original creators and designers of the games and with their unique storyline, ships and alien characters. Reiche and Ford, the Original Star Control Games and Reiche's Preexisting Characters themselves have individually acquired valuable fame, reputation and goodwill among the purchasing public.

21. The name "Star Control" itself is as functional, forming and integral part of the foundation of Reiche's story. More specifically, "Star Control" is the interstellar military wing of the United Nations' originally established during the Clone Revolt of 2085 and that was later placed under the direct authority of "The Alliance of Free Stars" during the war between the Alliance and the Ur-Quan and their Hierarchy of Battle Thralls.

22. There term “Star Control” is ever further descriptive, particularly when used as all or part of the historical game titles or to refer to or reference Reiche’s Original Star Control Games and Star Control 3.

23. The alleged “assignment” of the 1996 Star Control Registration to Applicant was made without any of the actual “goodwill” associated and attributed to the Original Star Control Games or Reiche. Particularly, despite the purported assignment, Applicant received an exclusive right or license to use any “Star Control” marks on any product or for and a service having substantially the same characteristics as the Original Star Control Games or Reiche’s Preexisting Characters.

24. Since 2001, all assets in and to the Star Control, including but not limited to, all marks and other intellectual property rights, otherwise not adopted and used by the Accolade in the marketing and publishing of Star Control and the names/titles, sub-names/titles, cover art, characters (e.g., aliens), alien race names, characters names, planet names, spaceship names and spaceship designs, remained or reverted to Reiche.

25. Since Reiche’s open source release of The Ur-Quan Masters in 2002, various marks associated with that game have been in use in U.S. commerce by Reiche and others, including THE UR-QUAN MASTERS Mark. The rights and goodwill established from such use and associated with such marks has inured to the benefit of Reiche and others.

26. THE UR-QUAN MASTERS Mark has obtained valuable fame, reputation and goodwill as a result of the long-standing use of the mark in U.S. commerce and its association with Reiche, the Open Source Project and the highly successful Original Star Control Games.

27. In October 2017, Reiche and Ford learned that Stardock had begun selling the Classic Star Control Games, including The Ur-Quan Masters through Steam, a digital distribution platform, without Reiche’s permission and in violation of their copyrights.

28. Applicant now seeks to expand the classes of goods and services covered by its purported STAR CONTROL Mark. On November 27, 2017, Applicant filed U.S. Trademark Application No. 87,697,919 (i.e. the Opposed Mark) and on February 22, 2018, Applicant filed U.S. Trademark Application No. 87,807,839, both for the mark STAR CONTROL. In the former application, Applicant falsely represented to the USPTO that it has used this mark in commerce since at least August 10, 2013, and its specimen of use was also fraudulent in consisting of screenshots of websites from late 2017 and early 2018, and Reiche and Ford assume that Applicant will claim the same first date of use for the latter application.

29. In late 2017, Applicant began improperly using Reiche's THE UR-QUAN MASTERS Mark on its website by marketing the Classic Star Control Games in association with its own products and services. A screenshot of Applicant's website with links to buy these games through Steam, and showing an example of Applicant's use of THE UR-QUAN MASTERS Mark is below:



30. On or about December 14, 2017, Applicant filed U.S. Trademark Application No. 87,720,654 to register the mark THE UR-QUAN MASTERS. Applicant claims therein that it has used the mark since at least August 10, 2013, but this representation is false. Indeed, Applicant submitted a specimen appearing to consist of: a) a screenshot from the 1992 version of Star Control II published by Accolade; b) screenshots of GOG's and Steam's websites from in or around October-November 2017; and c) screenshots of Applicant's website from June 2018. A non-final Office action has been sent (issued) to the Applicant.

31. On January 26, 2018, Reiche filed U.S. Trademark Application No. 87,772,787 to register the mark THE UR-QUAN MASTERS for Computer game programs; Computer game software; Game software; Video and computer game programs; Computer programs for video and computer games; Downloadable computer game programs; Interactive game software; Interactive video game programs. A non-final Office action has been sent (issued) to the Reiche indicating that the filing date of pending U.S. Application Serial No. 87220654 precedes Reiche's filing date and upon receipt of applicant's response to this Office action, action on Application No. 87,772,787 may be suspended pending final disposition of the earlier-filed referenced application.

32. In addition, Applicant filed the following applications:

- U.S. Trademark Application No. 87,662,697 for the mark SUPER MELEE
- U.S. Trademark Application No. 87,810,480 for the mark ORZ
- U.S. Trademark Application No. 87,810,484 for the mark UR-QUAN
- U.S. Trademark Application No. 87,810,486 for the mark SYREEN
- U.S. Trademark Application No. 87,810,492 for the mark SPATHI
- U.S. Trademark Application No. 87,810,495 for the mark ANDROSYNTH

- U.S. Trademark Application No. 87,810,499 for the mark CHENJESU
- U.S. Trademark Application No. 87,810,502 for the mark ILWRATH
- U.S. Trademark Application No. 87,810,516 for the mark PKUNK
- U.S. Trademark Application No. 87,810,518 for the mark ARILOU
- U.S. Trademark Application No. 87,810,526 for the mark VUX
- U.S. Trademark Application No. 87,810,528 for the mark MELNORME
- U.S. Trademark Application No. 87,825,741 for the mark YECHAT
- U.S. Trademark Application No. 87,877,907 for the mark TAALO
- U.S. Trademark Application No. 87,877,969 for the mark DNYARRI
- U.S. Trademark Application No. 88,016,293 for the mark CRIMSON CORPORATION
- U.S. Trademark Application No. 88,016,354 for the mark FWIFFO

All the above terms were first used by Reiche as alien character names or as functional identifiers for other unique creative elements from the Original Star Control Games. To the extent that Applicant argues that the use of these names within the Original Star Control Games constituted use as trademarks in commerce, they were abandoned by Accolade/Atari since 2000, and the names have been used continuously by Reiche in connection with offering THE UR-QUAN MASTERS ever since.

33. The Opposed Mark is confusingly similar to or associated with Reiche Ur-QUAN MASTERS Mark, given that the dominant portion of the Opposed Mark is identical to Applicant's previously abandoned mark and forms part of the game's prior title and marks previously associated with the "Star Control: the Ur-Quan Masters" game.

34. The Opposed Mark is confusingly similar to the abandoned STAR CONTROL Mark given the public association created by the various titles of the Original Star Games

over the years (e.g. “Star Control: the Ur-Quan Masters”).

35. The goods and services in the Opposed Application are highly related to, if not the same as, the goods and services associated with the Original Star Control games.

36. Since Applicant’s abandonment of the STAR CONTROL Mark (via Accolade and Atari), beginning as early as 2001 and prior to Applicants’ filing date and, upon information and belief, prior to any date of first use that Applicants could claim, others have engaged in the offering of the same and/or similar goods and services for sale, distribution or publication, and advertising and promotion related to such goods and services, that are associated by the consuming public with the Original Star Control Games or the abandoned STAR CONTROL Mark throughout the U.S. As such, others and not Applicant hold prior common law rights in the STAR CONTROL Mark.

37. Applicant’s registration of the Opposed Mark will create a likelihood of confusion, mistake and/or deception among consumers, within the meaning of Trademark Act§ 2(d), 15 U.S.C. § 1052(d), all to the detriment of Frungy and Reiche.

38. Upon information and belief, Frungy avers that members of the relevant consuming public are likely to be confused, mistaken, or deceived as to the origin, sponsorship, or approval of Applicant’s goods and services to be marketed and offered under the Opposed Mark and misled into believing that such goods and services emanate from or are in some way associated with the Reiche or the Original Star Control Games.

39. Because the Opposed Mark is confusingly similar to the Original Star Control Games and because the goods and services listed in the Opposed Application are related to and, in some cases the same as the goods and services provided by Reiche, consumers would likely believe incorrectly that the Opposed Mark is associated with Star Control or Reiche or both.

40. Because the Opposed Mark is confusingly similar to or associated with Reiche's UR-QUAN MASTERS Mark and because the goods and services listed in the Opposed Application are related and, in some cases the same as the goods and services provided by Applicant, consumers would likely believe incorrectly that the Opposed Mark is associated with Reiche and the UR-QUAN MASTERS Mark.

41. The Opposed Mark, particularly when used to reference the Original Star Control Games or to contrast or distinguish Applicant's goods or services from the Original Star Control Games is merely descriptive or the Opposed Mark comprises matter that is functional.

42. The Opposed Mark falsely suggests to consumers a connection with Reiche and the Original Star Control Games. Applicant's registration of the Opposed Mark will therefore falsely suggest a connection with Reiche or Star Control or both within the meaning of Section 2(a) of the Trademark Act, 15 U.S.C. § 1052(a), to the detriment of Frungy and Reiche.

43. That there was no bona fide use of the Opposed Mark in commerce prior to the filing of the use-based application for its registration under Trademark Act §1(a), 15 U.S.C. § 1051(a).

44. A previously registered mark identical to the Opposed Mark has been abandoned due to nonuse with intent not to resume use, and nonuse for more than three consecutive years or due to that course of has caused the mark to lose significance as an indication of source.

45. Applicant has used the Opposed Mark so as to misrepresent the source or origin of its goods or services, including without limitation, by bundling its goods and services for sale along with Reiche's Original Star Control Games without license or

authorization.

46. Although the STAR CONTROL Mark was previously used to refer to a particular game or games, it is now often used to describe a whole group or genre of games making the mark generic and no longer a suitable designation of source or origin.

47. The Opposed Mark is not in lawful use in commerce because Applicant provision of the identified goods and/or services is unlawful under federal law, including, without limitation, under copyright and unfair competition law.

48. Applicant committed fraud in its application for registration and the pending application for the Opposed Mark was filed under bad faith or fraudulent circumstances.

49. The abandoned Star Control Mark has become a well-known or famous mark, and Applicant is not the original user of the mark.

50. Consumers have come to identify and associate the Opposed Mark with Reiche and Reiche's Original Star Control Games over time, and particularly with The Ur-Quan Masters game.

51. A civil action is filed and pending in United States District Court for the Northern District of California, Stardock Systems, Inc. v. Reiche, et al., Case No. 17-cv-07025-SBA, will have a bearing on the instant proceeding (“**Civil Action**”). On July 16, 2018, Reiche filed an Amended Counterclaim against Applicant for declaratory judgment re: trademark rights, alleging that Applicant has recently sought to expand the classes of goods and services covered by its purported STAR CONTROL trademark.

52. When parties to a case pending before the Trademark Trial and Appeal Board (“**TTAB**”) are engaged in a civil action that may have a bearing on the case, the TTAB may suspend the proceeding until termination of the civil action. 37 C.F.R. § 2.117(a); TBMP § 510.02(a). The TTAB has explained that “while a decision by the District Court would be

binding upon the Patent Office, a decision by the Trademark Trial and Appeal Board would only be advisory in respect to the disposition of the case pending in the District Court. Accordingly, and notwithstanding the fact that the Patent Office proceeding was the first to be filed, it is deemed to be the better policy to suspend proceedings herein until the civil suit has been finally concluded.” *Tokaido v. Honda Associates Inc.*, 179 USPQ 861, 862 (TTAB 1973).

53. The Civil Action currently pending in the Northern District of California involves (at least in part) essentially the same issues raised in the instant proceeding. The determination of these issues by the District Court will likely affect the issues involved in this proceeding.

WHEREFORE, Frungy believes and avers that it is being and will continue to be damaged by registration of the Opposed Mark as aforesaid, and requests that said Application Serial No. Serial No. 87/697,919 be rejected, that no registration be issued thereon to Applicants, and that this Opposition be sustained in favor of Frungy or the foregoing reasons. For the foregoing reasons, Reiche and Ford respectfully request suspension of this proceeding pending final determination of the Civil Action. Alternatively, Frungy respectfully request suspension of this proceeding pending final determination of the Civil Action.

Frungy has appointed Mark S. Palmer, member of a U.S. Bar in good standing, to prosecute this Opposition and to transact all business in and before the United States Patent and Trademark Office in connection herewith. Please address all correspondence to:

Mark. S. Palmer
4 Meadow Drive
Mill Valley, CA 94941
mark@palmerlex.com

Dated: September 19, 2018

Respectfully submitted,

By /Mark S. Palmer/

Mark. S. Palmer
4 Meadow Drive
Mill Valley, CA 94941

(415) 336-7002 (Phone)
mark@palmerlex.com
Counsel for Frungy

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **NOTICE OF OPPOSITION** was served on Applicants' attorney of record as listed with the U.S. Patent and Trademark Office this 19th Day of September 19, 2018, by sending the same, via first class mail and electronic mail to:

David L. May
Robert A. Weikert
Jennette E. Wiser
NIXON PEABODY LLP
799 9th Street NW
Suite 500
Washington, DC 20001
nptm@nixonpeabody.com
was.managing.clerk@nixonpeabody.com

/Mark S. Palmer/

Mark S. Palmer