

ESTTA Tracking number: **ESTTA176805**

Filing date: **11/26/2007**

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

**Petition for Cancellation**

Notice is hereby given that the following party requests to cancel indicated registration.

**Petitioner Information**

Name	The Saul Zaentz Company		
Entity	Corporation	Citizenship	Delaware
Address	2600 Tenth Street Berkeley, CA 94710 UNITED STATES		

Attorney information	Carole F. Barrett Howard Rice Nemerovski Canady Falk & Rabkin 3 Embarcadero Center 7th Floor San Francisco, CA 94111 UNITED STATES trademark@howardrice.com, cbarrett@howardrice.com, ddavishan@howardrice.com, chorak@howardrice.com Phone:415-434-1600		
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**Registration Subject to Cancellation**

Registration No	2812722	Registration date	02/10/2004
Registrant	Palantir Pictures, LLC 1401 Ocean Avenue, Suite 302 Santa Monica, CA 90401 UNITED STATES		

**Goods/Services Subject to Cancellation**

Class 041. First Use: 2002/11/15 First Use In Commerce: 2003/01/21 All goods and services in the class are cancelled, namely: production of motion pictures
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**Grounds for Cancellation**

Abandonment	Trademark Act section 14
Priority and likelihood of confusion	Trademark Act section 2(d)
Dilution	Trademark Act section 43(c)

**Mark Cited by Petitioner as Basis for Cancellation**

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	PALANTIR		
Goods/Services	Production of motion pictures, online entertainment, videogames, collectibles, et al.		

Attachments	PALANTIR PICTURES Petition for Cancellation.pdf ( 14 pages )(916545 bytes )
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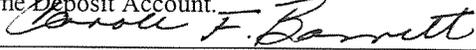
### **Certificate of Service**

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/CFB_ddh/
Name	Carole F. Barrett
Date	11/26/2007

I hereby certify that this correspondence is being deposited electronically with the Trademark Trial and Appeal Board on the date shown below.

By and through Opposer's attorney, the Trademark office is authorized by Carole F. Barrett, Attorney for Opposer, to charge the requisite filing fee of \$300.00 to the Deposit Account of Howard, Rice, Nemerovski, Canady, Falk & Rabkin, Account No. 08-2792. Please deduct any additional fees that may be due, or credit any overpayment, to the same Deposit Account.



Carole F. Barrett

Dated: November 26 2007

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

THE SAUL ZAENTZ COMPANY d.b.a.  
TOLKIEN ENTERPRISES,

Petitioner,

v.

PALANTIR PICTURES LLC,

Registrant.

Petition for Cancellation

Mark: PALANTIR PICTURES

Registration No. 2,812,722

Filed: March 4, 2003

Registered: February 10, 2004

Cancellation No.: \_\_\_\_\_

Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, VA 22313-1451

PETITION FOR CANCELLATION

The Saul Zaentz Company d.b.a. Tolkien Enterprises ("Petitioner" or "SZC"), a Delaware corporation with its principal place of business at 2600 Tenth Street, Berkeley, California 94710, believes that it is and will be damaged by the continued registration of the mark PALANTIR PICTURES, shown in Registration No. 2,812,722, and hereby petitions to cancel the same.

As grounds for this petition, Petitioner alleges:

1. Palantir Pictures, LLC (“Registrant”), a California limited liability company with an address at 1401 Ocean Avenue, Suite 302, Santa Monica, California 90401, filed use-based Application Serial No. 76/500,652 on March 4, 2003 (“Registrant’s Filing Date”), which subsequently matured into Registration No. 2,812,722 (the “Registration”) on February 10, 2004, for the mark PALANTIR PICTURES (the “Registered Mark”) for use in connection with “production of motion pictures” in Class 41 (“Registrant’s Services”). Registrant claims to have first used the Proposed Mark in connection with Registrant’s Services on November 15, 2002 (“Registrant’s Alleged Date of First Use”).

2. In the early 1930s, the late Professor J.R.R. Tolkien wrote a novel called *The Hobbit, Or There And Back Again* (hereinafter, “*The Hobbit*”). *The Hobbit* was first published in Great Britain in November 1937 and in the United States in January 1938. *The Hobbit* was an instant success and underwent over 20 printings before its sequel was published 16 years later.

3. The sequel to *The Hobbit* was published as a trilogy known as *The Lord of the Rings*. *The Lord of the Rings* trilogy comprises three individual volumes entitled *The Fellowship of the Ring*, *The Two Towers*, and *The Return of the King* (collectively, “*The Lord of the Rings* trilogy”). *The Fellowship of the Ring* was first published in the United States in October 1954. *The Two Towers* was first published in the United States in April 1955. The final volume of the trilogy, *The Return of the King*, was first published in the United States in January 1956.

4. *The Hobbit* and *The Lord of the Rings* trilogy are herein collectively referred to as the “Tolkien Works.”

5. Each of the Tolkien Works is currently in print in the United States, and has been in print continuously since long before Registrant’s Alleged Date of First Use. Each of the Tolkien Works became enormously popular soon after publication. By the time paperback editions of the Tolkien Works were published in the mid-1960s, the books had grown from mere bestsellers to cultural phenomena. By the 1970s, the Tolkien Works

were embraced by adolescents and college students, as well as their parents and grandparents.

6. By 1977, approximately nine different editions and over 60 printings of *The Hobbit* had been published, and approximately 50 printings of *The Lord of the Rings* trilogy had been published. To date, more than 45 million copies of the Tolkien Works have been sold in the United States. The Tolkien Works have been translated into over 35 different languages and have delighted readers around the world, selling more than 100 million copies worldwide. In short, the Tolkien Works are among the most well-known, popular and beloved series of literary works of all time, and have been so since long before Registrant's Filing Date and Alleged Date of First Use.

7. The Tolkien Works are set in Professor Tolkien's imaginary world of MIDDLE-EARTH, which is inhabited by Professor Tolkien's own invented characters and includes Professor Tolkien's own fanciful places, objects, and events.

8. The *Lord of the Rings* trilogy follows the adventures of a company of several characters called The Fellowship, which includes, among others, the characters ARAGORN (a human), FRODO (a hobbit), and GANDALF (a wizard) throughout MIDDLE-EARTH, in an attempt to destroy the magical ONE RING and the Dark Lord SAURON, as well as his minion, the evil wizard SARUMAN.

9. In the Tolkien Works, the characters' use of magical powers and objects drives the narrative from the beginning of the epic story to the end, and figures prominently in many of the most dramatic scenes. The use of magical objects is, in fact, one of the most defining characteristics of the Tolkien Works, from the titular Ring in *The Lord of the Rings* to enchanted armor made of MITHRIL metal. Another type of magical object conceived by Professor Tolkien is the PALANTIR stones. Each of the PALANTIR stones in the Tolkien Works functions somewhat like a crystal ball, allowing a user to see across great distances and communicate with the users of other PALANTIR stones. Characters with very strong magical powers, such as SAURON, are able to use a PALANTIR stone to influence and control the minds of other users.

10. PALANTIR stones play a critical role in the plot of the Tolkien Works. For example, SAURON recruits SARUMAN, one of his most powerful allies, by ensnaring the wizard's mind as he looks into a PALANTIR stone. SARUMAN subsequently becomes a major threat to the individuals and mission of The Fellowship. In another example, ARAGORN taunts SAURON through a PALANTIR stone to distract him from the progress of FRODO, causing SAURON to launch a battle for which he was unprepared, heavily influencing the outcome of the war in the finale of *The Lord of the Rings*. The importance of the PALANTIR stones to the story is also reflected in the title for Chapter XI of Book Three of *The Lord of the Rings: The Two Towers* — “The Palantír.” The term PALANTIR is essential to the mythology of the Tolkien Works, and is inextricably associated with Professor Tolkien's central theme of the use of magical power.

11. Due to the enormous following enjoyed by the Tolkien Works and the important role played by the PALANTIR stones in the Tolkien Works, the fanciful term PALANTIR has become widely known among the consuming public as an important ingredient of the Tolkien mythology, and has come to symbolize the Tolkien Works, the derivative works based on them, and the distinctive fantasy characters, places, objects and events created by Professor Tolkien therein.

12. Since the late 1960s, Petitioner and its predecessors in interest have held the right to use, and license others to use, marks related to the Tolkien Works, including, without limitation, the titles of each of the Tolkien Works and the names and visual representations of the characters, places, objects, and events described in the Tolkien Works, including without limitation characters such as FRODO, ARAGORN, and GANDALF, places such as MIDDLE-EARTH, RIVENDELL, and MORDOR, and objects such as MITHRIL, THE ONE RING, and PALANTIR (collectively, the “Tolkien Marks”). Petitioner also holds exclusive, worldwide theatrical motion picture and live stage production rights in and to the Tolkien Works, as well as the right to, or to license others the right to, sell merchandise and provide services in connection with such film

and stage productions.

13. For example, in the mid-1970's, Petitioner produced an animated film version of *The Lord of the Rings* directed by Ralph Bakshi (the "Bakshi Film"). The Bakshi Film's initial theatrical release was in 1978, and it remains in distribution today. The Bakshi Film garnered extensive publicity and commendation, including a Golden Globe® award nomination. The Bakshi Film has grossed over \$30 million in the United States since its release, and has remained commercially available for home viewing since its theatrical release. Petitioner engaged in significant advertising and merchandising efforts in connection with the Bakshi Film.

14. More recently, and well before Registrant's Filing Date and Alleged Date of First Use, Petitioner licensed its film and certain related merchandising rights related to the Tolkien Works to New Line Cinema Corporation ("New Line"). New Line has released a total of three live action, special effects-packed films based on *The Lord of the Rings*, including *The Lord of the Rings: The Fellowship of the Ring*, *The Lord of the Rings: The Two Towers*, and *The Lord of the Rings: The Return of the King* (collectively, the "New Line Film Trilogy").

15. Like the books and the Bakshi Film, the New Line Film Trilogy features Professor Tolkien's fanciful characters, objects, events, and places, including the PALANTIR stones, thereby perpetuating the mythology of the Tolkien Works, and the importance of PALANTIR stones within the mythology.

16. At least as early as July 1999, well before Registrant's Filing Date and Alleged Date of First Use, New Line began to heavily publicize the highly-anticipated New Line Film Trilogy, including through press releases and through widespread distribution of theatrical trailers in movie theaters and on the Internet.

17. The New Line Film Trilogy has been one of the most acclaimed and successful film series of all time. Each film in the New Line Film Trilogy is among the top grossing films of all time in the United States and abroad.

18. The first film of the New Line Film Trilogy, *The Lord of the Rings: The*

*Fellowship of the Ring*, was theatrically released in December 2001, and grossed over \$47 million in its opening weekend. The film has grossed over \$313 million in the United States, and over \$867 million worldwide. *The Lord of the Rings: The Fellowship of the Ring* received four Golden Globe® award nominations, including Best Picture (Drama) and Best Director, and 13 Academy Award® nominations, including nominations for Best Picture and Best Supporting Actor, and won four awards.

19. The second film of the New Line Film Trilogy, *The Lord of the Rings: The Two Towers*, was theatrically released in December 2002, and grossed over \$62 million in its opening weekend. The film has grossed approximately \$341 million in the United States, and over \$926 million worldwide. *The Lord of the Rings: The Two Towers* received two Golden Globe® award nominations, including Best Picture (Drama) and Best Director, six Academy Award® nominations, including a nomination for Best Picture, and won two awards.

20. The third film of the New Line Film Trilogy, *The Lord of the Rings: The Return of the King*, was theatrically released in December 2003, and grossed over \$72 million in its opening weekend. The film has grossed approximately \$377 million in the United States, and more than \$1 billion worldwide. *The Lord of the Rings: The Return of the King* received four Golden Globe® award nominations and won four awards, including Best Picture (Drama), Best Director, Best Original Score and Best Original Song. *The Lord of the Rings: The Return of the King* received 11 Academy Award® nominations and won eleven awards, including those in the categories of Best Picture, Best Director and Writing (Adapted Screenplay).

21. Since the late 1970's, Petitioner has licensed, and continues to license, many stage productions based on the Tolkien Works, thereby extending the mythology of the Tolkien Works to segments of the public beyond those reached by the books and films. For example, Petitioner licensed the public performance in Delaware of a stage adaptation of *The Lord of the Rings* in 1978. Petitioner also licensed the stage rights to *The Lord of the Rings* to the Theater Sans Fil of Montreal, which performed its puppet

version of *The Lord of the Rings* at the Shubert Performing Arts Center in New Haven, Connecticut in 1986. In addition, Petitioner licensed Stage One of Louisville, Kentucky, one of the nation's leading youth performance groups, to perform an adaptation of *The Hobbit* from 1988 to 1991. More recently, Petitioner licensed Kevin Wallace Limited to produce a stage musical based on *The Lord of the Rings*, which premiered in Toronto, Canada on March 23, 2006. This epic stage musical was heavily advertised and promoted in major markets within the United States, including the New York City metropolitan area. The stage production is currently running on the London's West End. These and many other stage adaptations of the Tolkien Works authorized by Petitioner over the years have featured various fanciful characters, places, object and events, as depicted in Professor Tolkien's imaginary world, further perpetuating the mythology of the Tolkien Works.

22. Beginning in at least the mid-1970s, Petitioner established, and has continued to maintain, a successful worldwide merchandising program to offer goods and services based on the Tolkien Works. As part of this program, Petitioner and its licensees have aggressively promoted the Tolkien Marks through numerous channels of trade. Petitioner has used, and licensed others to use, the Tolkien Marks in connection with a wide variety of commercial goods and services, including, without limitation: toys, puzzles, role-playing games, board games, computer and video games, restaurant services, beverages, candy, retail services, online services, jewelry, collectible plates; pewter mugs, pewter goblets, swords and other weapons, objects d'art, chess sets, metal miniature figures, calendars, comic books, postcards, stickers, lithographic prints, printed stationery, sheet music and other printed material, tarot cards, phonograph records, porcelain dolls, plush dolls, hats, clothing, souvenir merchandise, and fan club services, among many others.

23. Petitioner has used, and has licensed others to use, the Tolkien Marks continually since long before Registrant's Filing Date and Alleged Date of First Use. Petitioner and its licensees continue to expand the licensing program for the Tolkien Marks to additional goods and services.

24. Petitioner has used and/or licensed others to use the PALANTIR mark continuously, since before Registrant's Alleged Date of First Use, in connection with goods and services that include, but are not limited to, video games, online entertainment, and collectibles.

25. Separately and in addition to Petitioner's rights based on use of the PALANTIR mark in commerce, Petitioner has protectable rights in PALANTIR as a key element in the mythology of *The Lord of the Rings*. As a result of the enormous following enjoyed by the Tolkien Works over nearly seventy years and their broad dissemination throughout virtually all types of media, including but not limited to the Bakshi Film and the New Line Film Trilogy, the fictional term PALANTIR has come to be recognized by the consuming public as an ingredient or symbol of Professor Tolkien's mythology, and is strongly associated with the Tolkien Works and the goods and services of Petitioner and Petitioner's licensees.

26. On information and belief, Registrant sought to capitalize on the mythology of the Tolkien Works by adopting the Registered Mark, in spite of Petitioner's rights in the Tolkien Works, Petitioner's long and continuous use of the PALANTIR mark and other Tolkien Marks, and the strong public perception of PALANTIR as an ingredient that has come to symbolize the Tolkien Works and the goods and services of Petitioner and Petitioner's licensees.

27. On information and belief, Registrant adopted and commenced using the Registered Mark with knowledge of Petitioner's and its predecessors-in-interests' prior use of and trademark rights in the PALANTIR mark and other Tolkien Marks, and with the intention of unfairly trading upon the goodwill associated with Petitioner's Tolkien Marks.

28. Petitioner applied to register its PALANTIR mark in Classes 6, 14, 20, and 28 for a range of consumer products and merchandise, and in Class 41 for, *inter alia*, "production and distribution of motion pictures" via Application Serial Nos. 77/244,547, 77/244,563, 77/244,572, 77/244,580, and 77/244,586, respectively.

29. On the basis of the Registered Mark, the U.S. Patent and Trademark Office has refused registration of Petitioner's PALANTIR mark in Class 41, Application Serial No. 77/244,586, asserting that because the services of both Registrant and Petitioner include the production of motion pictures, the marks are likely to be confused.

30. On information and belief, Registrant has not produced any motion pictures to date. On information and belief, Registrant formerly operated a website at [www.palantirpictures.com](http://www.palantirpictures.com), but as of the date of this Petition, Registrant's former website at [www.palantirpictures.com](http://www.palantirpictures.com) cannot be accessed via the Internet. On information and belief, Registrant is no longer the registered owner of the domain name [www.palantirpictures.com](http://www.palantirpictures.com).

31. On information and belief, as of the date of this Petition, the California Secretary of State records list Registrant's legal status as "canceled."

32. On information and belief, as of the date of this Petition, Registrant maintains no listings in the online Yellow Pages directories.

33. On information and belief, Registrant is no longer in business, is not using the mark PALANTIR PICTURES in commerce, and has abandoned the mark within the meaning of Section 14 of the Lanham Act, 15 U.S.C. §1064(3).

34. To the extent that Registrant is still in business and is using the Registered Mark in commerce, however unlikely, continued existence of the Registered Mark in connection with Registrant's Services creates a likelihood of confusion, mistake or deception in the minds of prospective consumers as to the origin, sponsorship, or approval of Registrant's Services, within the meaning of Section 43 of the Lanham Act, 15 U.S.C. §1125(a).

35. To the extent that Registrant is still in business and is using the Registered Mark in commerce, however unlikely, Registrant's registration and use of the Registered Mark irreparably damages Petitioner's exclusive right to use, promote, and license the Tolkien Marks, including PALANTIR, in connection with goods and services. Such damage to Petitioner will be continuing, as the public is likely to believe that Petitioner is

sponsoring or endorsing Registrant's Services.

36. To the extent that Registrant is still in business and is using the Registered Mark in commerce, however unlikely, deficiencies or faults in the quality of the Registrant's Services are likely to reflect negatively upon, tarnish, and seriously injure the reputation that Petitioner has established for the wide variety of goods and services produced or licensed by Petitioner under or in association with the Tolkien Marks. This is likely to result in loss of revenues to Petitioner and damage to its reputation.

#### FIRST GROUND FOR RELIEF

##### ABANDONMENT UNDER 15 U.S.C. §1064(3)

37. Petitioner incorporates by reference paragraphs 1 through 36, as if fully set forth herein.

38. On information and belief, Registrant has never actually produced any motion pictures, and does not currently maintain an operational website.

39. On information and belief, Registrant is not using the Registered Mark in United States commerce, has not used it for three or more years, and does not intend to resume use, having abandoned the mark within the meanings of Sections 14 and 45 of the Lanham Act, 15 U.S.C. §§1064(3) and 1127.

40. On information and belief, Registrant has in fact ceased to exist, thus abandoning the mark within the meanings of Sections 14 and 45 of the Lanham Act, 15 U.S.C. §§1064(3) and 1127.

#### SECOND GROUND FOR RELIEF

##### LIKELIHOOD OF CONFUSION UNDER 15 U.S.C. §1052(d)

41. Petitioner incorporates by reference paragraphs 1 through 36, as if fully set forth herein.

42. Petitioner has used the Tolkien Marks, including PALANTIR, in United States commerce since long before Registrant's Filing Date and Alleged Date of First Use.

43. The Registered Mark is nearly identical to Petitioner's PALANTIR mark in sight, sound and commercial impression.

44. Petitioner and its licensees offer a wide range of goods and services in connection with the Tolkien Marks, including services identical to Registrant's, the production of motion pictures in Class 41, and other highly related goods and services.

45. Petitioner owns numerous trademark applications and registrations for the Tolkien Marks, including a substantial number of registrations and/or applications in International Class 41, as well as for other related goods and services.

46. The fictional PALANTIR stone has come to be recognized by the consuming public as an ingredient or symbol of Professor Tolkien's mythology, and is strongly associated with the Tolkien Works. As such, PALANTIR serves to identify all goods and services created, distributed, and/or licensed by or on behalf of Petitioner under any of the Tolkien Marks.

47. The use by Registrant of the Registered Mark for Registrant's Services, namely, production of motion pictures, is likely to create the erroneous impression that Registrant's Services originate with, are sponsored or promoted by, or are otherwise associated with Petitioner or the motion pictures, stage productions, merchandise, or other goods and services that Petitioner has produced and licensed.

48. Registrant's continued registration and use of the Registered Mark in connection with Registrant's Services is likely to cause confusion, mistake, or deception in the minds of prospective consumers as to the origin, sponsorship, or approval of Registrant's Services, within the meaning of Section 2 of the Lanham Act, 15 U.S.C. §1052(d).

THIRD GROUND FOR RELIEF  
DILUTION UNDER 15 U.S.C. §1125(c)

49. Petitioner incorporates by reference paragraphs 1 through 36, as if fully set forth herein.

50. The Tolkien Marks, including PALANTIR, are widely recognized by the consuming public of the United States as a designation of the source of the goods and services of Petitioner, and have been so recognized since long before Registrant's Filing Date and Alleged Date of First Use.

51. The fictional PALANTIR stone has come to be recognized by the consuming public as an ingredient or symbol of Professor Tolkien's mythology, and is strongly associated with the Tolkien Works. As such, PALANTIR serves to identify all entertainment and other goods and services created, distributed, and/or licensed by or on behalf of Petitioner under any of the Tolkien Marks.

52. The Tolkien Marks, including PALANTIR, are famous, and have been famous since long before Registrant's Alleged Date of First Use.

53. Registrant's use of the Proposed Mark is likely to dilute by blurring the strength and value of the Tolkien Marks, including PALANTIR, by affecting the ability of these marks to serve as unique identifiers of Petitioner's goods and services, thereby causing serious injury to the reputation and goodwill that Petitioner has established in its Tolkien Marks, within the meaning of Section 43 of the Lanham Act, 15 U.S.C. §1125(c)(2)(B).

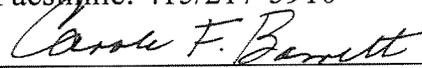
54. Registrant's use of the Proposed Mark is likely to dilute by tarnishment the strength and value of the Tolkien Marks, including PALANTIR, by creating an association that harms the reputation of Petitioner's famous Tolkien Marks, within the meaning of Section 43 of the Lanham Act, 15 U.S.C. §1125(c)(2)(C).

55. WHEREFORE, Petitioner respectfully requests that this Petition be granted in favor of Petitioner and that Registration No. 2,812,722 be canceled.

By and through Petitioner's attorney, the USPTO is authorized by Carole F. Barrett, Attorney for Petitioner, to charge the requisite filing fee of \$300.00 to the Deposit Account of Howard Rice Nemerovski Canady Falk & Rabkin, Account No. 08-2792. Please deduct any additional fees that may be due, or credit any overpayment, to the same Deposit Account.

DATED: November 26, 2007.

CAROLE F. BARRETT  
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Carole F. Barrett

Attorneys for Petitioner  
THE SAUL ZAENTZ COMPANY  
d.b.a. TOLKIEN ENTERPRISES

**PROOF OF SERVICE BY MAIL**

The undersigned declares and says as follows: my business address is Three Embarcadero Center, Seventh Floor, San Francisco, CA 94111-4024. I am employed in the City and County of San Francisco; I am over the age of 18 years, and I am not a party to this cause. I am readily familiar with this business' practices for collection and processing of correspondence for mailing with the United States Postal Services. On the same day that a sealed envelope is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service with postage fully prepaid.

I served the within **PETITION FOR CANCELLATION OF REGISTRATION NO. 2,812,722** to Registrant at its address of record:

Palantir Pictures, LLC  
1401 Ocean Avenue  
Suite 302  
Santa Monica, California 90401

by placing a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, for deposit in the United States mail for collection and mailing on this day following ordinary business practices of Howard, Rice, Nemerovski, Canady, Falk & Rabkin, PC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration is executed in San Francisco, California, this 26th day of November, 2007.



By: Lois M. Simón

1464145