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Filing date: **08/25/2010**

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

Proceeding	92051659
Party	Plaintiff Nowlan Family Trust
Correspondence Address	John J. O'Malley Volpe and Koeing, P.C. 30 S. 17th Street - United Plaza Philadelphia, PA 19103 UNITED STATES JOMalley@volpe-koenig.com, ktinker@volpe-koenig.com, ptomail@volpe-koenig.com
Submission	Other Motions/Papers
Filer's Name	John J. O'Malley
Filer's e-mail	JOMalley@volpe-koenig.com, ktinker@volpe-koenig.com, ptomail@volpe-koenig.com
Signature	/John J. O'Malley/
Date	08/25/2010
Attachments	Petitioner's Opposition to Response to Board Order.pdf (26 pages)(974607 bytes)

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

In the Trademark Cancellation of

Mark: BUCK ROGERS
Registration No.: 714,184
Registered: April 18, 1961

Cancellation No. 92051659

Date: August 25, 2010

-and-

Mark: BUCK ROGERS
Registration No.: 1,555,871
Registered: September 12, 1989

Nowlan Family Trust,
Petitioner,

v.

Dille Family Trust,
Registrant.

**PETITIONER'S OPPOSITION TO REGISTRANT'S REPLY TO ORDER TO
SHOW CAUSE AND MOTION FOR RECONSIDERATION**

Petitioner, Nowlan Family Trust, (hereinafter "Petitioner"), hereby opposes Registrant's, Dille Family Trust (hereinafter "Registrant") reply to the Trademark Trial and Appeal Board's (hereinafter "Board") July 21, 2010 Order to Show Cause and moves the Board for an order of default and seeks reconsideration of the Board's August 19, 2010 Order. ¹

¹ In support of Petitioner's Opposition to Registrant's Reply to Order to Show Cause, Petitioner submits the Declaration of John J. O'Malley, which is incorporated herein by reference (hereinafter "O'Malley Decl. ¶ ____").

I. BACKGROUND

On October 26, 2009, Petitioner filed a Petition for Cancellation against Registrant's Registration Nos. 714,184 and 1,555,871 for BUCK ROGERS on the grounds that Registrant has abandoned its marks. Upon information and belief, Registrant has abandoned the use the mark BUCK ROGERS in interstate commerce or in connection with the goods covered by the subject Registrations. Also, Registrant has falsely alleged dates of use of the mark in its Declaration of Use filed along with its renewal application in 2001.

On March 26, 2010, Petitioner's counsel informed Registrant's counsel by letter that the responses to Petitioner's discovery requests were deficient and specified in detail the deficiencies. Petitioner's counsel requested supplemental responses to Petitioner's discovery requests. (O'Malley Decl. ¶ 2)

On April 13, 2010 and again on April 21, 2010, Petitioner's counsel sent a letter to Registrant's counsel requesting a date certain by which Petitioner would receive outstanding supplemental discovery responses and documents. (O'Malley Decl. ¶ 3).

On April 27, 2010, Petitioner's counsel informed Registrant's counsel that a substantive response was needed by May 4, 2010, else Petitioner would file a motion to compel. (O'Malley Decl. ¶ 4) Also on April 27, 2010, Petitioner served its Second Request for Production of Documents, Second Request for Admissions and Second Set of Interrogatories on Registrant. (O'Malley Decl. ¶ 5)

After months of repeated attempts to secure outstanding incomplete discovery responses of Registrant, Petitioner was informed on June 2, 2010, that Registrant's counsel filed a motion to withdraw as counsel for Registrant. (O'Malley Decl. ¶ 6).

Petitioner filed a motion to compel outstanding discovery on June 4, 2010. (O'Malley Decl. ¶ 7).

On June 9, 2010, the Board issued an order staying proceedings, including the resolution of Petitioner's pending motion for 30 days so that Registrant could find new counsel or choose to represent itself. (O'Malley Decl. ¶ 8).

Registrant did not file a reply to the Board within the allotted 30 days. (O'Malley Decl. ¶ 9). On July 21, 2010, the Board issued an Order allowing Registrant an additional 30 days to show cause why judgment should not be entered against Registrant for its apparent loss of interest in this case. (O'Malley Decl. ¶ 9).

On August 16, 2010, Registrant filed a response to the Board's order and its new attorney entered an appearance. (O'Malley Decl. ¶ 10). On August 19, 2010, the Board resumed proceedings including the resolution of Petitioner's pending motion, providing Registrant until September 8, 2010 to reply. (O'Malley Decl. ¶ 11).

II. ARGUMENT

A. Judgment should be entered against Registrant.

Registrant did not show any interest in its mark until this proceeding was filed by Petitioner. Registrant has abandoned and ceased to use the mark

BUCK ROGERS in interstate commerce or in connection with the goods covered by the subject Registrations and has abandoned any and all claims to maintain the registration of its mark. Additionally, Registrant's sworn declaration submitted as part of its renewal application in 2001, which states that the mark BUCK ROGERS was still in use in 2001 for newspaper comic strips, was knowingly and intentionally false. Registrant had not used the mark on or in connection with each of those goods since before 1999, and relied on out of date specimens to try to establish use in commerce. In addition, Registrant has failed to show interest in this proceeding by failing to provide discovery to Petitioner on numerous occasions, and has failed to meet deadlines for responding to Orders set by the Board.

After this proceeding was filed, Registrant showed no interest in resolving this dispute and began a barrage of dilatory tactics and simply ignored Petitioner's repeated requests. (O'Malley Decl. ¶¶ 2-5) It is now almost one year later in this proceeding and Registrant has yet to produce requested discovery, which is telling on the merits of this simple case.

In addition, Registrant, having substantial business experience in the entertainment business, is not an unsophisticated party unable to represent its own interests. Registrant, well aware of the merits of the case, and fully capable of defending its own interests, again employed dilatory tactics and chose not to respond to the Board's Order of June 9, 2010.

As set forth in the accompanying Declaration of John J. O'Malley, Petitioner has made a good faith effort to move this proceeding forward. However, Petitioner

has met with resistance by way of dilatory tactics by Registrant in its efforts to bring this matter to an expeditious closure. As such, Petitioner seeks an order from the Board entering a default judgment against Registrant based on Registrant's apparent loss of interest in the case.

B. Registrant's delay is willful and in bad faith.

Registrant has had ample opportunity and time to prove that it still has an interest in this case and has failed to do so. Over the course of almost a year, Registrant could have produced discovery that would suggest its use and continued interest in its mark.

This is a relatively simple case for cancellation of a trademark on the grounds of abandonment or fraud. Registrant has ignored Petitioner's discovery requests and now blames a lack of communication with prior counsel for its delay. Registrant's "cautious selection" of new counsel does not excuse its repeated delay in responding to legitimate discovery requests by Petitioner. Registrant began its dilatory plan well before its prior counsel withdrew and before they began their "cautious selection" of new counsel.

At this point, over 5 months have passed since Registrant's discovery responses were due. This delay in the production of documents, that potentially may have been used to bolster its case, only solidifies Registrant's lack of interest in this case.

As stated above, Registrant is not an uninformed individual unaware of its obligations to this Board. Registrant is well aware of the nature of these

proceedings and is fully capable of replying on time to an Order issued by this Board and to discovery requests of Petitioner. Registrant's delay in responding to discovery requests of Petitioner and to Order's issued by this Board are simply dilatory tactics to willfully and in bad faith lengthen these proceedings.

C. Registrant's delay caused prejudice to Petitioner.

Registrant's repeated refusal to provide discovery to Petitioner along with its dilatory actions have caused Petitioner to petition the Board for information it is entitled to receive wasting time, money and energy in seeking to resolve this proceeding. Despite repeated attempts to gain access to discovery documents, Petitioner was met with a barrage of dilatory tactics. The Registrant received the Board's initial June 9, 2010 Order and waited until August 16, 2010 to respond. Clearly the failure to respond to discovery with the postponement in the production of documents, and delays in responding to the Board's Order are dilatory tactics.

Registrant's failure to respond to Petitioner's lawful discovery has prevented this preceding from moving forward and bringing this matter to an expeditious closure. Further, Petitioner's trademark application, Registration No. 77/650,082 is blocked by the registration at issue in this proceeding. This delay is hampering Applicant's business opportunities associated with the trademark and trademark application. Petitioner has been prejudiced by both the non-disclosure and delay in proceedings and will be at a disadvantage in its efforts to prepare for trial after wasting time, money and energy chasing Registrant for information and playing Registrant's dilatory games.

D. Registrant does not have a meritorious defense.

Registrant has abandoned and ceased to use the mark BUCK ROGERS in interstate commerce or in connection with the goods covered by the subject Registrations. Also, Registrant has falsely alleged dates of use of the mark in its Declarations of Use filed along with its renewal application in 2001. In addition, Registrant has failed to show interest in this proceeding by failing to provide discovery to Petitioner on numerous occasions, and has failed to meet deadlines for responding to Orders set by the Board.

Registrant claims to have a meritorious defense for its registrations yet refuses to provide answers to discovery that would enable Petitioner to verify its claims. Registrant alleges over seventy (70) years of use of its mark but is unwilling or unable to provide discovery of this information to Petitioner. By merely alleging a tumultuous relationship between Registrant and Petitioner, where Registrant claims to be protecting its mark from Petitioner for over seventy (70) years, Registrant tries to show interest in its mark and in this proceeding. As stated above, Registrant has abandoned the trademark and has committed fraud by relying on out of date specimens to try to establish use in commerce.

Registrant's sworn declaration submitted as part of its renewal application in 2001, which states that the mark BUCK ROGERS was still in use in 2001 for newspaper comic strips, was knowingly and intentionally false.

Registrant did not show any interest in its mark until this proceeding was filed by Petitioner. As stated above, Registrant abandoned its marks and by its conduct, has abandoned any and all claims to maintain the registration of its mark.

III. CONCLUSION

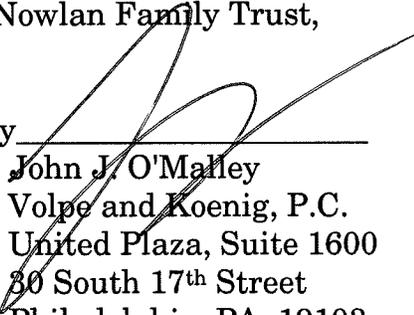
For the foregoing reasons, Petitioner respectfully requests that the Board:

1. Find that Registrant has showed lack of interest in Registration Nos. 714,184 and 1,555,871 for BUCK ROGERS.
2. Direct that judgment be entered against Registrant canceling Registration Nos. 714,184 and 1,555,871 for BUCK ROGERS.
3. Provide any further relief favorable to Petitioner that the Board deems just.

Respectfully submitted,

Nowlan Family Trust,

Dated: 8/25/10

By 
John J. O'Malley
Volpe and Koenig, P.C.
United Plaza, Suite 1600
30 South 17th Street
Philadelphia, PA 19103
Telephone: 215-568-6400
Facsimile: 215-568-6499
Attorney for Petitioner

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

In the Trademark Cancellation of

Mark: BUCK ROGERS
Registration No.: 714,184
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-and-

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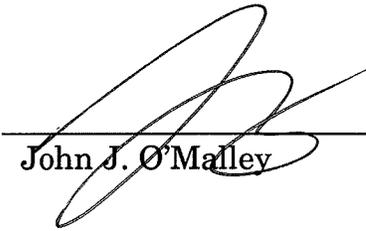
Dille Family Trust,
Registrant.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing, Petitioner's Opposition to Registrant's Reply to Order to Show Cause, was served on Registrant and Registrant's counsel as follows:

Maurice B. Pilosof, Esquire
1925 Century Park East, Suite 2300
Los Angeles, CA 90067
Via first class mail

Date: 8/25/10



John J. O'Malley

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

In the Trademark Cancellation of

Mark: BUCK ROGERS
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**DECLARATION OF JOHN J. O'MALLEY IN SUPPORT OF PETITIONER'S
OPPOSITION TO REGISTRANT'S REPLY TO ORDER TO SHOW CAUSE**

I, John J. O'Malley, do hereby declare and state as follows:

1. I am a shareholder at the law firm of Volpe and Koenig P.C., counsel for Petitioner, Nowlan Family Trust (hereinafter "Petitioner") in the above captioned matter. I submit this Declaration along with documents attached for purposes of providing information and identifying exhibits in support of Petitioner's Opposition to Registrant's Reply to Order to Show Cause.

2. On March 26, 2010, Petitioner's counsel informed Registrant's counsel by letter that the responses to Petitioner's discovery requests were deficient and

specified in detail the deficiencies. Petitioner's counsel requested supplemental responses to Petitioner's discovery requests. Attached hereto as Exhibit A is a true and correct copy of the March 26, 2010 correspondence.

3. On April 13, 2010 and again on April 21, 2010, Petitioner's counsel sent a letter to Registrant's counsel requesting a date certain by which Petitioner would receive outstanding supplemental discovery responses and documents. Attached hereto as Exhibits B and C are true and correct copies of the April 13, 2010 and April 21, 2010 correspondence.

4. On April 27, 2010, Petitioner's counsel informed Registrant's counsel that a substantive response was needed by May 4, 2010, else Petitioner would file a motion to compel. Attached hereto as Exhibit D is a true and correct copy of the April 27, 2010 correspondence.

5. Also on April 27, 2010, Petitioner served its Second Request for Production of Documents, Second Request for Admissions and Second Set of Interrogatories on Registrant.

6. After months of repeated attempts to secure outstanding incomplete discovery responses of Registrant, Petitioner was informed on June 2, 2010 that Registrant's counsel filed a motion to withdraw as counsel for Registrant. Attached hereto as Exhibit E is a true and correct copy of the June 2, 2010 correspondence.

7. Petitioner filed a motion to compel discovery on June 4, 2010.

8. On June 9, 2010, the Board issued an order staying proceedings, including the resolution of Petitioner's pending motion for 30 days so that Registrant could find new counsel or choose to represent itself.

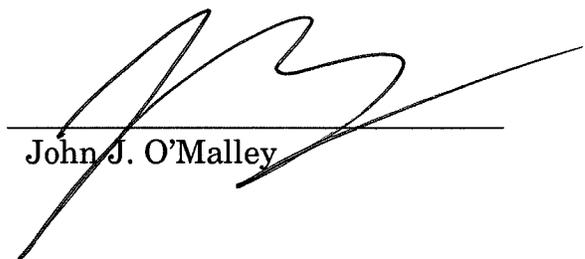
9. Registrant did not file a reply to the Board within the allotted 30 days and on July 21, 2010, the Board issued an Order allowing Registrant an additional 30 days to show cause why judgment should not be entered against Registrant for its apparent loss of interest in this case.

10. On August 16, 2010, Registrant filed a response to the Board's order and its new attorney entered an appearance.

11. The Board resumed proceedings including the resolution of Petitioner's pending motion, providing Registrant until September 8, 2010 to reply.

Pursuant to 28 U.S.C. §1746, I, John J. O'Malley, further declare under penalty of perjury that all statements made herein based on my own personal knowledge are true and that all statements made on information and belief are believed to be true.

Date: 8/25/10



John J. O'Malley

EXHIBIT A

John J. O'Malley
jomalley@volpe-koenig.com

March 26, 2010

David Donahue, Esquire
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, NY 10017

VIA E-MAIL AND U.S. MAIL

Re: Cancellation of Buck Rogers Trademark Registrations
Cancellation No. 92051659

Dear Mr. Donahue:

We have reviewed the Dille Family Trust's responses to Petitioner's discovery requests and have found the following responses to be deficient:

Interrogatories

1. Response No. 6. This response references Response No. 3 and is not responsive.
2. Response Nos. 10, 11, 12, 13. To the extent not otherwise produced, all documents referring to the date of first use in commerce and documents relating to continuous use in commerce of Registrant's Marks.
3. Response No. 16. Given the nature of the proceeding, we believe any documents relating to registrations owned by Registrant anywhere in the world are relevant.
4. Response Nos. 21-24. All responsive documents regarding channels of trade, distribution, manufacturing and retail sales of Registrant's Products are relevant.
5. Response Nos. 25-26. All responsive documents regarding licenses and assignments of Registrant's Marks are relevant.
6. Response No. 27. Further details regarding the statement concerning the abandonment of Registrant's Marks "periods of non-use of Registrant's Mark on or in connection with a particular product, such periods were the result of the cyclical nature of the licensing business with respect to famous entertainment characters such as Registrant's BUCK ROGERS character."
7. Response No. 28. All responsive documents relating to allegations and contentions in Registrant's Answer to Petition to Cancel must be produced immediately.



David Donahue, Esquire
Page 2

March 26, 2010
BUCK ROGERS

8. Response No. 35. All responsive documents relating to media outlets where Registrant's products are or will be advertised or promoted.

Admissions

1. Response No. 3. All responsive documents relating to the dates of sale of newspaper comic strips.
2. Response No. 4. All responsive documents relating to the date of sale of board games.

Please provide the above information by Friday, April 2, 2010. In addition, please provide dates and times that are convenient for inspection of the documents referenced but not attached to Petitioner's First Set of Document Requests and any other responsive documents not otherwise produced.

If you have any questions, please contact us.

Very truly yours,

Volpe and Koenig, P.C.

By: _____
John J. O'Malley

JJO/MDD/kat

EXHIBIT B



United Plaza
30 South 17th Street
Philadelphia, PA 19103

Telephone: +1-215-568-6400
Facsimile: +1-215-568-6499
www.volpe-koenig.com

BRINGING LAW TO YOUR IDEAS®

John J. O'Malley
jomalley@volpe-koenig.com

April 13, 2010

David Donahue, Esquire
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, NY 10017

VIA E-MAIL AND U.S. MAIL

Re: Cancellation of Buck Rogers Trademark Registrations
Cancellation No. 92051659

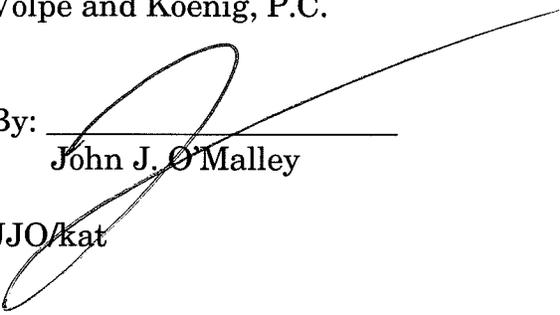
Dear Mr. Donahue:

I write to follow-up your March 29, 2010 e-mail. I understand you have returned to the office. Please advise when we can expect to receive a response to our March 26, 2010 correspondence.

We look forward to your reply.

Very truly yours,

Volpe and Koenig, P.C.

By: 
John J. O'Malley

JJO/kat

EXHIBIT C



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30 South 17th Street
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Resent via e-mail

John J. O'Malley
jomalley@volpe-koenig.com

4/21/10

April 13, 2010

David Donahue, Esquire
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, NY 10017

VIA E-MAIL AND U.S. MAIL

Re: Cancellation of Buck Rogers Trademark Registrations
Cancellation No. 92051659

Dear Mr. Donahue:

I write to follow-up your March 29, 2010 e-mail. I understand you have returned to the office. Please advise when we can expect to receive a response to our March 26, 2010 correspondence.

We look forward to your reply.

Very truly yours,

Volpe and Koenig, P.C.

By: _____
John J. O'Malley

JJO/kat

EXHIBIT D



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John J. O'Malley
jomalley@volpe-koenig.com

April 27, 2010

David Donahue, Esquire
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, NY 10017

VIA E-MAIL AND U.S. MAIL

Re: Cancellation of Buck Rogers Trademark Registrations
Cancellation No. 92051659

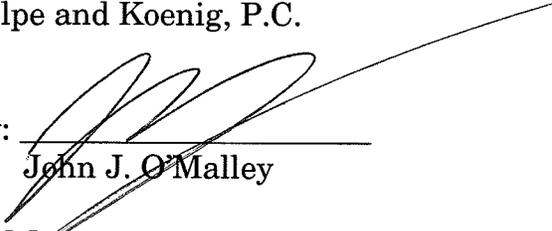
Dear Mr. Donahue:

I write in response to your e-mail dated April 22, 2010. Unless we receive a substantive response to our March 26, 2010 correspondence by **Tuesday, May 4, 2010**, we will seek necessary relief from the T.T.A.B.

We look forward to your reply.

Very truly yours,

Volpe and Koenig, P.C.

By: 
John J. O'Malley

JJO/kat

EXHIBIT E

Katie Tinker

From: David Donahue [mailto:ddonahue@fzlj.com]
Sent: Wednesday, June 02, 2010 7:54 PM
To: John O'Malley
Cc: Melissa D. Doogan; Katie Tinker; Lawrence Apolzon
Subject: RE: Nowlan Family Trust v. Dille Family Trust, Cancellation No. 92051659

John:

Our firm filed a Motion for Withdrawal as Counsel for Registrant earlier today. In light of this, we trust you will agree that any inspection of documents should be put off until the motion is resolved.

Sincerely,

David Donahue
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, New York 10017
Phone: 212-813-5990
Fax: 212-813-5901
Web: www.fzlj.com

From: John O'Malley [mailto:JOMalley@volpe-koenig.com]
Sent: Wednesday, June 02, 2010 11:26 AM
To: David Donahue
Cc: Melissa D. Doogan; Katie Tinker
Subject: RE: Nowlan Family Trust v. Dille Family Trust, Cancellation No. 92051659

David:

I will be in New York on another matter on Friday and would like to inspect the documents at 11:00 a.m. Please confirm that is acceptable.

Regards,

John

John J. O'Malley
Volpe and Koenig, P.C.
Telephone: 1-215-568-6400
Facsimile: 1-215-568-6499
E-mail: jomalley@volpe-koenig.com

From: David Donahue [mailto:ddonahue@fzlj.com]
Sent: Thursday, May 06, 2010 11:34 PM

8/25/2010

To: John O'Malley
Cc: Melissa D. Doogan; Katie Tinker
Subject: RE: Nowlan Family Trust v. Dille Family Trust, Cancellation No. 92051659

Dear John:

Please see the attached correspondence.

Sincerely,

David Donahue
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, New York 10017
Phone: (212) 813-5900
Fax: (212) 813-5901
E-mail: ddonahue@fzlz.com
Web: www.fzlz.com

From: John O'Malley [mailto:JOMalley@volpe-koenig.com]
Sent: Tuesday, May 04, 2010 10:46 AM
To: David Donahue
Cc: Melissa D. Doogan; Katie Tinker
Subject: RE: Nowlan Family Trust v. Dille Family Trust, Cancellation No. 92051659

David:

I can gibe you until Thursday, but cannot go beyond that.

Regards,

John

John J. O'Malley
Volpe and Koenig, P.C.
Telephone: 1-215-568-6400
Facsimile: 1-215-568-6499
E-mail: jomalley@volpe-koenig.com

From: David Donahue [mailto:ddonahue@fzlz.com]
Sent: Monday, May 03, 2010 4:27 PM
To: John O'Malley
Cc: Melissa D. Doogan; Katie Tinker
Subject: RE: Nowlan Family Trust v. Dille Family Trust, Cancellation No. 92051659

John:

Please hold off on filing any motion until the end of the week. I expect to have an answer for you within the

8/25/2010

next few days. Thank you for your patience,

Sincerely,

David Donahue
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, New York 10017
Phone: 212-813-5990
Fax: 212-813-5901
Web: www.fzlz.com

From: Katie Tinker [mailto:KTinker@volpe-koenig.com]
Sent: Tuesday, April 27, 2010 3:24 PM
To: David Donahue
Cc: John O'Malley; Melissa D. Doogan
Subject: Nowlan Family Trust v. Dille Family Trust, Cancellation No. 92051659

Dear Mr. Donahue:

Mr. O'Malley asked me to forward the attached correspondence. If you have any questions, please contact Mr. O'Malley.

Regards,

Katie A. Tinker
Litigation Paralegal
Volpe and Koenig, P.C.
United Plaza, Suite 1600
30 South 17th Street
Philadelphia, PA 19103
Direct: 215.255.9140
Fax: 215.568.6499



United Plaza
30 South 17th Street
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8/25/2010

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