

ESTTA Tracking number: **ESTTA566226**

Filing date: **10/22/2013**

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

Proceeding	92053298
Party	Plaintiff Tyler Perry Studios, LLC
Correspondence Address	VICTOR K SAPPHERE CONNOLLY BOVE LODGE HUTZ LLP 333 S GRAND AVENUE, SUITE 2300 LOS ANGELES, CA 90071 UNITED STATES
Submission	Motion to Extend
Filer's Name	Victor K. Sapphire, Esq.
Filer's e-mail	trademarks@novakdruce.com, vsapphire@novakdruce.com, czukowski@novakdruce.com
Signature	/victorsapphire/
Date	10/22/2013
Attachments	VKS DECL WHAT WOULD JESUS 2nd Mo to Extend VKS Decl.pdf(60817 bytes) KEARNEY IMDB.pdf(153674 bytes) WWJD list no kearney-hollysouth.pdf(110953 bytes) HOLLYSOUTH.pdf(93603 bytes)

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

In the matter of Trademark Registration No. 3,748,123
Mark: WHAT WOULD JESUS DO
Registration date: February 16, 2010

Tyler Perry Studios, LLC	:	
	:	
Petitioner,	:	
	:	
v.	:	Cancellation No. 92053298
	:	
Kimberly Kearney	:	
	:	
Respondent.	:	

**DECLARATION OF VICTOR K. SAPPHIRE IN SUPPORT OF PETITIONER'S
OPPOSITION TO SECOND MOTION FOR EXTENSION OF TIME OR REQUEST
FOR SUSPENSION**

1. I, Victor Sapphire, am a Canadian citizen and intellectual property counsel to Petitioner Tyler Perry Studios, LLC ("TPS"). I am responsible for oversight and administration of TPS' trademark and intellectual property matters, including the instant Cancellation proceeding, and I have direct knowledge of the matters discussed herein.
2. True and correct copies of print-outs from the Internet Movie Database web site database of film and television production showing pages for Registrant in the names of Kimberly Kearney and Hollywood South, as well as the list of all productions that have used the title WHAT WOULD JESUS DO, are attached hereto as Exhibit "A".

The undersigned hereby declares and states that the facts set forth in this Declaration are true; that all statements made herein of the undersigned's own knowledge are true; that all statements made on information and belief are believed to be true; and further, that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any registration resulting therefrom.

Respectfully submitted,
TYLER PERRY STUDIOS, LLC

Dated October 21, 2013

_____/s/_____
Victor K. Sapphire
Novak Druce Connolly Bove + Quigg LLP
333 S Grand Avenue Suite 2300
Los Angeles CA 90071
213 787 2523

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October 2013 true and correct copies of the DECLARATION OF VICTOR SAPHIRE in support of Petitioner's Opposition was served on Respondent Kimberly Kearney, Hollywood South LLC, 17216 Saticoy Street, Suite 235, Van Nuys, California 91406, via first class mail.

/s/

Victor K. Sapphire

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Careers Industry Directory In Production STARmeter Box Office News

Poprah

Main Details Filmography Personal Details Media Contact Clients/Coworkers

- Main Details
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- Filmography
- Summary
- Year
- Profession
- Title Type
- TV Series
- Credited Name
- Genre
- Keyword
- Budget
- Box Office
- Ratings
- Votes

Personal Details

- Biography
- Quotes
- Trivia
- Other Works
- Awards
- Message Board

Media

- Photo Gallery
- Resume
- Publicity
- News Articles
- Twitter
- Blog
- Web Sites

Contact

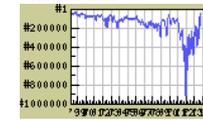
Clients/Coworkers

- by STARmeter
- by Company
- by Relationship

Publicist: Hollywood South [more >](#)
 Direct Contact: booking@poprah.net
 Profession: Actress / Self
 Known for: Honeybee / New York Hustle / One Night Only
 Also Known As: Kimberly Kearney / Tempest / Poprah [more >](#)

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STARmeter™



Current rank:
286,729
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Filmography sorted by:

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Past Films & Videos (5 titles)

	Year	MOVIE Meter	Budget	Opening Weekend	US Box Office
The Hunchback - Candy Johnson	2010	183,896			
Get Down on It (video) - Actress (as Tempest)	2001	250,131			
Honeybee - Tamika Jones (as Tempest)	2001	118,884			
Boobs a Lot (video) - Actress (as Tempest)	2001	223,985			
Preacher Player - Janita (as Tempest)	1998	423,293			

Past Television (1 title)

	Year	MOVIE Meter	User Rating	User Votes
I Want to Work for Diddy (TV series) - Herself (13 episodes, 2008), Actress (1 episode, 2008)		94,546	3.0	133
New York Hustle - Herself (as Kimberly Kearney)	2008			
One Night Only - Herself (as Kimberly Kearney)	2008			
Unforgivable Hustle - Herself (as Kimberly Kearney)	2008			
Hooray for Hollywood! - Herself (as Kimberly Kearney)	2008			
Diddy.com - Herself (as Kimberly Kearney)	2008			
(9 more)				

Self (1 title)

	Year	MOVIE Meter	User Rating	User Votes
Gothic Bellydance (video) - Herself (as Tempest)	2006	414,365		

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Search results for "what would jesus do"

Titles (Exact Matches): Displaying 4 Results

1. [What Would Jesus Do?](#) (2010, [Thomas Makowski](#))
aka "[WWJD What Would Jesus Do?](#)" - United States (*DVD title*)
 2. [What Would Jesus Do?](#) (2008 short, [Kacee DeMasi](#))
aka "[What Would JESUS Do?](#)" - United States (*alternative spelling*)
 3. [What Would Jesús Do?](#) (2009 short, [Victor Martin](#))
 4. [What Would Jesus Do?](#) (2011 short, [Melissa Kathleen Glassman](#))
- [more »](#)

Titles (Partial Matches): Displaying 1 Result

1. [What Would Jesus Really Do?](#) (2007 TV movie)
- [more »](#)

Titles (Approx Matches): Displaying 15 Results

1. [What Wouldn't Jesus Do?](#) (2002 TV short, [Rod J. Emelle](#))
 2. [What Would Jesus Buy?](#) (2007 documentary, [Rob VanAlkemade](#))
 3. [What Would Jesus Drive?](#) (2005 TV documentary, [Martin Herring](#))
 4. [What Would Jesus Play?](#) (2003 documentary short, [Brian Quist](#))
 5. [The Braggart; or, What He Said He Would Do and What He Really Did](#) (1908 short)
 6. [What Else Would I Do](#) (2010 documentary short, [Joel Bouwers...](#))
 7. [What Would Julieanna Do?](#) (2013 TV series)
 8. [What Would You Do to Deserve This Bench?](#) (2008 short, [Seth Oberle](#))
 9. [What Would Shakespeare Do?](#) (2004, [Roman Wyden](#))
 10. [Jane by Design](#) (2011 TV series, [April Blair](#))
aka "[What Would Jane Do](#)" - United States (*working title*)
 11. [Primetime: What Would You Do?](#) (2009 TV series)
 12. [What Would You Do?](#) (1991 TV series)
 13. [What would you do without me Dada Bunny?](#) (2012 short, [Lucien Bourjeily](#))
 14. [What It Takes: A Documentary About 4 World Class Triathletes' Quest for Greatness](#) (2006 documentary, [Peter Han](#))
 15. [What Would You Do for Love](#) (2012 short, [Larry Rosen](#))
- [more »](#)

Suggestions For Improving Your Results:

- There may be additional title matches amongst all the alternative titles we have for various regions and languages.
 - [AKA Title Search for "what would jesus do"](#).
- If you are searching for a particular episode of a TV Series, you should search for the title of the TV series, not the episode. Or you can use the following link to search all Episode Titles.
 - [Episode Title Search for "what would jesus do"](#).

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Hollywood South [us]

Main Details Filmography In Production Clients Staff Branch Offices Company Connections Staff Connections EDIT INFO

Main Details

Filmography

- Summary
- by Year
- by Job
- by Title Type
- by Genre
- by Keyword
- by Budget
- by Box Office
- by Ratings
- by Votes

In Production

Clients

- by Contact
- by Relationship
- by STARmeter

Staff

- by Branch
- by Occupation
- by STARmeter

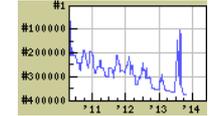
Branch Offices

Company Connections

Staff Connections

Type: Publicist

COMPANYmeter™



Current Rank: 377,189

Clients (Sorted by STARmeter)

STARmeter	Name	Agent (office)	Relationship
286,729	Poprah		Publicist

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