

ESTTA Tracking number: **ESTTA741890**

Filing date: **04/22/2016**

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

Proceeding	92060029
Party	Defendant Melvin N.A. Avanzado DBA The Avanzado Law Firm
Correspondence Address	ELAINE W YU THE AVANZADO LAW FIRM 1880 CENTURY PARK E, STE 1404 LOS ANGELES, CA 90067 UNITED STATES elaine@avanzadolaw.com, mel@avanzadolaw.com
Submission	Other Motions/Papers
Filer's Name	Elaine Yu
Filer's e-mail	elaine@avanzadolaw.com
Signature	/Elaine Yu/
Date	04/22/2016
Attachments	KDT declaration Mel v Jahn (FINAL).pdf(157953 bytes)

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

JAHN & ASSOCIATES, LLC

Petitioner,

v.

MELVIN N.A. AVANZADO,

Registrant/Respondent.

CANCELLATION NO.: 92060029

MARK: BIG FIRM EXPERIENCE,
SMALL FIRM SERVICE
(Registration Number: 4015965)

Filing Date: February 1, 2011.

DECLARATION OF KELLY D. TALCOTT

I, Kelly D. Talcott, declare as follows:

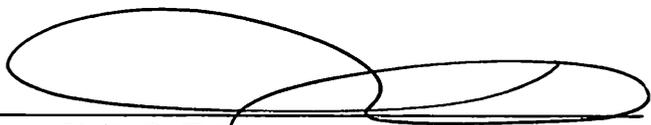
1. I am an attorney-at-law and am licensed to practice law in the State of New York. I am over 18 years of age. I have personal knowledge of the facts stated below, and if called to testify, could and would testify competently thereto.

2. I practice law through my law firm, The Talcott Law Firm, PC. I maintain a website for my firm: www.kdtalcott.com. In my website, I have one page entitled "What I Can Do For You." On that page, I use a tag line, "Big Firm Skills. Small Firm Service." I have had this tag line on my website since at least 2009.

3. I have never been contacted by any client or potential client who mistakenly contacted me but who instead was looking for The Avanzado Law Firm or Jahn & Associates, LLC. My firm and I have never been confused with either of those two law firms or their principal lawyers.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 21 day of April, 2016 at Sea Cliff, New York



Kelly D. Talcott

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age
3 of 18 years and am not a party to the within action. My business address is 1880 Century Park East,
4 Suite 1100, Los Angeles, California 90067. On the date set forth below, I caused the foregoing
document(s) described as

5 **DECLARATION OF KELLY D. TALCOTT IN SUPPORT OF RESPONDENT AND**
6 **DEFENDANT MELVIN N.A. AVANZADO’S MOTION FOR SUMMARY**
JUDGMENT

7 to be served on the interested parties in this action as follows by placing
8 the original a true copy thereof enclosed in sealed envelopes addressed as stated below:

9 Kirstin M. Jahn
10 Jahn & Associates, LLC
11 1942 Broadway, Suite 314
Boulder, Colorado 80304
<kirstin@jahnlaw.com>

12 **BY MAIL:** I sealed and placed such envelope for collection and mailing to be deposited in
13 the mail on the same day in the ordinary course of business at Los Angeles, California. The
14 envelope was mailed with postage thereon fully prepaid. I am readily familiar with this firm's
practice of collecting and processing correspondence for mailing. It is deposited with the
U.S. Postal Service on that same day in the ordinary course of business.

15 **BY OVERNIGHT COURIER:** I caused such envelope to be placed for collection and
16 delivery on this date in accordance with standard _____ delivery procedures.

17 **BY FAX:** In addition to service by mail, I transmitted a copy of the foregoing document(s)
18 this date via telecopier to the facsimile numbers shown above.

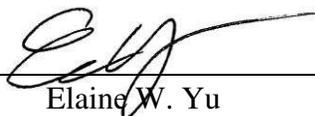
19 **BY ELECTRONIC MAIL:** I personally delivered such envelope by electronic mail to the
20 addressee(s) shown above.

21 **BY PERSONAL SERVICE:** I personally delivered such envelope by hand to the
22 addressee(s) shown above.

23 [State] I declare under penalty of perjury under the laws of the State of California that the
24 above is true and correct.

25 [Federal] I declare that I am employed in the office of a member of the Bar of this Court at
26 whose direction the service was made. I declare under penalty of perjury that the
27 foregoing is true and correct.

28 Executed on April 22, 2016 at Los Angeles, California.



Elaine W. Yu