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Filing date: **02/13/2015**

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

Proceeding	92060599
Party	Defendant Thomas Clark
Correspondence Address	THOMAS CLARK 1571 CHESTNUT ST SAN FRANCISCO, CA 94123 UNITED STATES
Submission	Motion to Dismiss - Rule 12(b)
Filer's Name	Kuscha Hatami
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Date	02/13/2015
Attachments	1. Turnkey Motion to Dismiss.pdf(645042 bytes)

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

<p>Turn-Key Vacation Rentals, Inc.</p> <p style="text-align:center">Petitioner,</p> <p style="text-align:center">v.</p> <p>Thomas Clark</p> <p style="text-align:center">Registrant.</p>	<p>Cancellation No. 92060599</p> <p>Mark(s): TURNKEY</p> <p>Reg. No. 4340236</p> <p>Reg. Date: May 21, 2013</p>
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**REGISTRANT’S MOTION TO DISMISS FOR
FAILURE TO STATE A CLAIM REGARDING
ALL COUNTS AND MEMORANDUM OF LAW**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Registrant Thomas Clark (hereinafter “Registrant” or “Clark”) through his undersigned attorney(s) submits this motion to dismiss all counts of the Petition for Cancellation (“Cancellation”) filed by Petitioner Turn-Key Vacation Rentals, Inc. (“Petitioner”) for failure to state a claim upon which relief can be granted.

Factual Background

On October 25, 2012, Registrant filed an application for the word Mark TURNKEY (U.S. Serial No. 85/763,978). Registrant’s Mark was issued a federally protected trademark with the USPTO on May 21, 2013. On December 24, 2014, Petitioner filed this Cancellation against Registrant alleging (1) Priority and Likelihood of Confusion, and (2) Fraud.

Argument

Registrant respectfully submits that all counts of the Cancellation fail to meet the requirements of sufficiently alleging (1) Priority and Likelihood of Confusion, and (2) Fraud, and therefore should be dismissed.

The standard governing motions to dismiss under Fed. R. Civ. P. 12(b)(6) is identified below:

In order to withstand a motion to dismiss for failure to state a claim, a plaintiff need only allege such facts as would, if proved, establish that (1) the plaintiff has standing to maintain the proceedings, and (2) a valid ground exists for opposing the mark. The pleading must be examined in its entirety, construing the allegations therein liberally, as required by Fed. R. Civ. P. 8(f), to determine whether it contains any allegations, which if proved, would entitle plaintiff to the relief, sought. *See Lipton Industries, Inc. v. Ralston Purina Co.*, 670 F.2d 1024, 213 USPQ 185 (CCPA 1982); *Kelly Services Inc. v. Greene's Temporaries Inc.*, 25 USPQ2d 1460 (TTAB 1992); and TBMP §503.02 (2d. ed. rev. 2004). For purposes of determining a motion to dismiss for failure to state a claim upon which relief can be granted, all of plaintiff's well-pleaded allegations must be accepted as true, and the complaint must be construed in the light most favorable to plaintiff. *See Advanced Cardiovascular Systems Inc. v. SciMed Life Systems Inc.*, 988 F.2d 1157, 26 USPQ2d 1038 (Fed. Cir. 1993); *see also* 5A Wright & Miller, Federal Practice And Procedure: Civil 2d §1357 (1990). ... The purpose of a Rule 12(b)(6) motion is to challenge “the legal theory of the complaint, not the sufficiency of any evidence that might be adduced” and “to eliminate actions that are fatally flawed in their legal premises and destined to fail ...” *Advanced Cardiovascular Systems Inc. v. SciMed Life Systems Inc.*, *supra* at 26 USPQ2d 1041. *Meckatzer Löwenbräu Benedikt Weiß KG v. White Gold, LLC*, 95 USPQ2d 1185 (TTAB 2010) (*citing Fair Indigo LLC v. Style*

Conscience, 85 USPQ2d 1536, 1538 (TTAB 2007)); *see also*, *Young v. AGB Corp.*, 152 F.3d 1377, 47 USPQ2d 1752, 1754 (Fed. Cir. 1998).

FRAUD

To plead a claim of fraud, Petitioner must allege that Registrant made a specific false statement of material fact in the course of the involved registration and that Registrant made such false statement with the intent of deceiving the USPTO into issuing a registration to which Registrant is not entitled. *See In re Bose Corp.*, 580 F.3d 1240, 91 USPQ2d 1938 (Fed. Cir. 2009). Under *In re Bose Corp.*, “a trademark is obtained fraudulently under the Lanham Act only if the applicant or registrant knowingly makes a false, material representation with the intent to deceive the PTO.” *Id.* at 1941; *see also In re Anderson*, 101 USPQ2d 1912, 1915 (TTAB 2012) (Identifying a large number and diverse range of goods and services may bring additional potential claims, including fraud or lack of bona fide intent to use). Pursuant to Fed. R. Civ. P. 9(b) any allegations based on “information and belief” must be accompanied by a statement of facts upon which the belief is based. *Asian and Western Classics B.V. v. Selkow*, 92 USPQ2d 1478-1479 (TTAB2009), *citing Exergen Corp. v. Wal-Mart Stores Inc.*, 91 USPQ2d 1656, 1670 n.7 (Fed. Cir. 2009).

Furthermore, in order to establish a proper pleading of a fraud claim, “a petitioner must allege the elements of fraud with particularity in accordance with Fed. R. Civ. P. 9(b), made applicable to Board proceedings by Trademark Rule 2.116(a).” *Asian and Western Classics B.V. v. Lynne Selkow*, 92 USPQ2d 1478 (TTAB 2009). More specifically, under Rule 9(b), together with Fed. R. Civ. P. 11 and USPTO Rule 11.18, “the pleadings [must] contain explicit rather than implied expression of the circumstances constituting fraud.” *Id.*, *citing King Automotive*,

Inc. v. Speedy Muffler King, Inc., 667 F.2d 1008, 212 USPQ 801, 803 (CCPA 1981); *see also* Wright & Miller, Federal Practice and Procedure: 5A § 1296.

In the case of *Asian and Western Classics*, the Board found that the Petitioner's allegations based on information and belief were insufficient for pleading fraud, generally indicating that, "Allegations based solely on information and belief raise only the mere possibility that such evidence may be uncovered and do not constitute pleading of fraud with particularity." *Asian and Western Classics B.V. v. Lynne Selkow*, 92 USPQ2d 1478 (TTAB 2009). Consequently, any allegations made upon "information and belief" must be accompanied by a statement of facts upon which the belief is founded. *See Exergen Corp., v. Wal-Mart Stores, Inc.*, 575 F.3d 1312 (Fed. Cir. 2009).

In contrast, the Board in *Meckatzer* found Petitioner's pleading of fraud sufficient where, "[Petitioner's] allegations are not based solely on 'information and belief,' but are also based on the results of an investigation which, petitioner alleges, revealed that respondent was not using its mark on all of the goods listed in its Statements of Use at the time the Statements of Use were filed." *Meckatzer, supra*, at p. 5 of decision. (emphasis added) More specifically, Petitioner in *Meckatzer* alleged that it engaged a private investigator who contacted a representative for Respondent, and ultimately learned that the Respondent never used the at-issue mark in connection with any product other than vodka. *Id.* at p.2-3 of decision.

Applying *Asian and Western Classics* and *Meckatzer* to the instant case, Registrant argues that Petitioner's Cancellation on its face fails to adequately plead a claim of fraud. The Cancellation merely contains conclusory statements alleging that, based on Petitioner's dubious belief, Registrant had a purposeful intent to deceive without providing any factual circumstances

to support such statements with particularity. For example, Petitioner's Cancellation alleges the following:

- On September 5, 2012, Respondent sent email correspondence to Petitioner asking Petitioner if she was interested in selling the domain name "turnkeyvacationrentals.com."
- On September 5, 2012, Petitioner informed Respondent that the domain name "turnkeyvacationrental.com" was not for sale and that Petitioner was pursuing plans to use the domain name "turnkeyvacationrentals.com," as well as others associated with it.
- At the time Respondent filed Application Serial Number 85763978, Respondent had constructive notice of Petitioner's use of the name TURN-KEY VACATION RENTALS for her vacation rental business, since the name of Petitioner's corporation was a matter of public record in the State of California.
- At the time Respondent filed Application Serial Number 85763978, Respondent had actual notice of Petitioner's use of the domain name "turnkeyvacationrentals.com," and her intent to use them in connection with her business.
- As an attorney with significant experience in Internet businesses and domain names, Respondent was uniquely aware of Petitioner's rights in the mark TURN-KEY VACATION RENTALS.
- As an attorney with significant experience selecting and marketing Internet businesses based on highly-attractive domain names, Respondent was uniquely aware of the value of Petitioner's "turnkeyvacationrentals.com" domain name.

- Since respondent was unable to purchase the domain name “turnkeyvacationrentals.com” and since Respondent knew or should have known that Petitioner was using the name TURN-KEY VACATION RENTALS, Respondent intentionally registered the Mark “TURNKEY” in an effort to block Petitioner from being able to register and/or enforce the TURN-KEY VACATION RENTALS Mark.
- Petitioner made actual, or at least analogous, use of the TURN-KEY mark at least as early as July 2, 2011 when Petitioner registered the Internet domain name turnkeyvacationrental.com through the Internet Registrar 1and1.com and certainly by February 27, 2012 when Petitioner adopted the corporate name TURN-KEY VACATION RENTALS, INC.

(Petitioner’s Petition for Cancellation, ¶¶ 16 – 17, 20 – 24, and 35)

Even construing such allegations in the light most favorable to Petitioner, Petitioner’s allegations that (a) Registrant contacted Petitioner to purchase a domain (that was nothing more than a url “parking” landing page with no use of the term TurnKey therein or business name and no information as to its intended use – *See* Exhibit A), that (b) Registrant should have known that Petitioner claimed trademark rights based on a corporate registration with the State of California, that (c) Petitioner’s mere ownership of the domain name turnkeyvacationrentals.com amounts to trademark rights and/or actual notice of trademark rights, that (d) because Petitioner is an attorney who has started internet businesses, he should have been aware that simply owning a domain name gives one trademark rights, that (e) he should have been aware that there is value in Petitioner’s domain name, that (f) simply because Petitioner did not sell its domain name to Registrant, he somehow attempted to hi-jack the Mark by filing an application with the USPTO,

and (g) because Petitioner stated that she has plans to use the domain name sometime in the future, that this somehow afforded her trademark rights, and that (h) simply because Petitioner registered a domain name, and subsequently a corporate entity with similar name, this amounts to actual or in the least analogous trademark use. All of these allegations fail to establish the level of particularity commanded by *Meckatzer*, wherein the petitioner in that case alleged facts pertaining to their own investigation into the Registrant's usage of the mark.

Here Petitioner conducted no investigation, and failed to include any factual allegations to support the conclusion that Registrant committed fraud when filing his application. Quite the opposite, Petitioner's allegations are a roadmap for a showing that there was absolutely no fraud on the part of Registrant's actions.

First, Petitioner admits that it merely informed Registrant that it had plans to use the domain name. Plans to use a domain name do not constitute trademark rights nor is it an indication of use in commerce. In addition, the evidence propounded by Petitioner, shows that Petitioner never informed Registrant that these alleged plans included the offering of real property rentals or related services. Petitioner's allegations would indicate that Registrant is a mind reader, which he is not. Petitioner could have used the domain name for a multitude of vacation rentals that would not involve real estate, by way of example, car, motorcycle, jet-ski, boat, hiking, skiing, and bicycling equipment for vacations. Petitioner could also have intent to use it for an all inclusive activity vacation package service that offered, camping equipment, hiking tours, river rafting, and picnics.

As defined by google.com, TURNKEY is "of or involving the provision of a complete product or service that is ready for immediate use." *See* Exhibit B. According the Merriam-Webster, TURNKEY is defined as "built, supplied, or installed complete and ready to operate".

See Exhibit C. Finally, according to the Urban Dictionary, in popular culture, TURNKEY is referred to as “A Completed and to end solution requiring no additional effort, or Something that is finished and ready to go, such as a car that has been completely restored and every detail is flawless, or being ready to go on a trip, bags packed, passport in hand, money in pocket”. See Exhibit D.

Moreover, simply because Registrant had intended to use the domain for real property rentals, does not transfer that intent to Petitioner, nor would it have been reasonable for Registrant to make that assumption.

Second, Petitioner asserts that because it owned a domain name and had registered a Corporate name with the State of California, that this is sufficient evidence for (a) constructive notice of trademarks rights, (b) priority on actual use in commerce, or (c) use analogous to trademark use. Under 15 U.S.C. §§ 1057(c) and 1141f(b), filing any application for registration on the Principal Register, including an intent-to-use application, constitutes constructive use of the mark, provided the application matures into a registration. Upon registration, filing affords the applicant nationwide priority over others, except: (1) parties who used the mark before the applicant’s filing date; (2) parties who files in the USPTO before the applicant; or (3) parties who are entitled to an earlier priority filing date based on the fling of a foreign application under U.S.C. §1126(d) or §1141(g). See *Zirco Corp v. American Telephone and Telegraph Co.*, 21 USPQ2d 1542 (TTAB 1991). Petitioner admittedly did not use, nor gave constructive notice of rights in the TURNKEY Mark prior to Registrant’s use and/or filing of his application for the TURNKEY Mark.

Finally, even if Petitioner is given the opportunity to take discovery of Registrant, Petitioner’s pleading of fraud lack an appropriate allegation of intent and intent is based solely

on the “mere possibility” that it will be able to uncover evidence to support its claim. *See In re Bose Corp.*, 91 U.S.P.Q.2d at 1939-50. Petitioner’s allegations of fraud rest solely on the fact that Registrant is an attorney and has previously been involved in Internet based companies, which naturally would involve the registration of domain names. Petitioner’s pleading of fraud lacks sufficient specific underlying facts, which the Board cannot reasonably infer from whether Registrant acted with the requisite state of mind. *See Exergen Corp. v. Wal Mart Stores Inc.*, 91 U.S.P.Q.2d 1656 1667, n.4 (Fed. Cir. 2009).

Therefore, where Petitioner’s fraud claim on its face fails to meet the pleading requirements set forth in *Asian and Western Classics*, Petitioner’s claim of fraud should be stricken by the Board.

PRIORITY AND LIKELIHOOD OF CONFUSION

To allege a valid ground for cancellation under Section 2(d), Petitioner need only allege it has priority of use and that respondent’s Mark so resembles Petitioner’s Mark as to be likely to cause confusion. *See Lanham Act § 2(d)*, 15 U.S.C. § 1052(d); *Otto Roght & Co. v. Universal Foods Corp.*, 640 F.2d 1317, 209 USPQ 40 (CCPA 1981).

Although Petitioner has dubiously plead that it enjoys priority and that the Marks are so similar as to be likely to cause confusion, Petitioner also admitted that it does not have actual or analogous use of the at issue Mark, priority in the Mark, nor constructive notice. Specifically, in § 35 of the Cancellation, Petitioner alleges that: “Petitioner made actual, or at least analogous, use of the Turn-key Mark at least as early as July 2, 2011 when Petitioner registered the Internet domain name turkeyvacationrental.com through the Internet Registrar 1and1.com, and certainly by February 27, 2012 when Petitioner adopted the corporate name “Turn-Key Vacation Rentals, Inc. As discussed above, registering a domain name and corporate entity do not constitute use in

commerce, analogous or otherwise. In addition, in § 20 of the Cancellation, Petitioner plead that “At the time respondent filed Application Serial Number 85763978, Respondent had constructive notice of Petitioner’s use of the name TURN-KEY VACATION RENTALS for her vacation rental business, since the name of Petitioner’s corporation was a matter of public record with the State of California.” As discussed above, registering a name with the State of California does not amount to constructive notice of trademark rights.

Petitioner’s inferior rights as to priority are further supported by Petitioner’s clear lack of use of the Mark in Interstate Commerce as admitted in U.S. Application Serial No. 86/477,775 for its TURN-KEY VACATION RENTALS Mark. Here Petitioner specifically admits that it first used the Mark on February 27, 2012, with a first use in Interstate Commerce on October 1, 2014. *See* Exhibit E. October 1, 2014 is approximately one year after Registrant filed his application, and approximately two years after Registrant’s first use in Interstate Commerce.

In view thereof, Registrant’s claim for priority and likelihood of confusion in the Cancellation should be stricken by the Board. *See* Fed. R. Civ. P. 12(f); TBMP § 506.01.

Conclusion

For the foregoing reasons, this proceeding should be dismissed with prejudice in favor of Registrant.

Dated: February 13, 2015

Respectfully submitted,

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Attorney for Registrant
Thomas Clark

CERTIFICATE OF SERVICE

I certify that on this 13th day of February 2015, a true copy of the foregoing
**REGISTRANT’S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM
REGARDING ALL COUNTS AND MEMORANDUM OF LAW** is being served by mailing
a copy thereof, by USPS addressed to the following individuals, identified in the Cancellation as
the attorney(s) of record and correspondents for Petitioner listed below.

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Thomas Clark

EXHIBIT A



http://www.turnkeyvacationrentals.com/ Go

3 captures
28 Jul 14 - 18 Dec 14

JUN JUL DEC
2013 28 2014 2015



This Site Is Under Construction and Coming Soon.

 ご覧のサイトは只今制作中です。
今しばらくお待ちください。

This Domain Is Registered with Network Solutions

EXHIBIT B

About 408,000 results (0.54 seconds)

turn·key

/ˈtɜrnˌkeɪ/ 

noun archaic

noun: **turnkey**; plural noun: **turnkeys**; noun: **turn-key**; plural noun: **turn-keys**

1. a jailer.

adjective

adjective: **turnkey**; adjective: **turn-key**

1. of or involving the provision of a complete product or service that is ready for immediate use.
"turnkey systems for telecommunications customers"

Translate turnkey to 

Use over time for: turnkey



Show less

EXHIBIT C



Is it "healthy" or "healthful"?
Watch and find out!

Word of
the Day

untenable



SEARCH >

Merriam-Webster

turnkey

adjective

Share +1 Tweet

: complete and ready to be used

Full Definition of TURNKEY

: built, supplied, or installed complete and ready to operate <a *turnkey* nuclear plant> <a *turnkey* computer system>; *also* : of or relating to a turnkey building or installation <a *turnkey* contract> <*turnkey* vendors>

See [turnkey](#) defined for English-language learners >>

First Known Use of TURNKEY

1927

Other Business Terms

amortize, caveat emptor, clearinghouse, divest, due diligence, emolument, green-collar, marque, overhead, perquisite

Learn More About TURNKEY

SCRABBLE®: Playable words you can make from "turnkey"

Browse

Next Word in the Dictionary: [turn-key job](#)

Previous Word in the Dictionary: [turnix](#)

Trend Watch



Conflate

Brian Williams's confused recollection of an Iraq War experience ...

EXHIBIT D

2

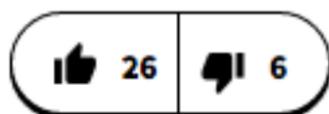
Turn Key

Something that is finished and ready to go. A car that has been completely restored and every detail is flawless. Being ready to go on a trip, bags packed, passport in hand, money in pocket.

Damm, look at that chevy, that things turn key.

Were leaving at 3 pm, you better be turn key or we will leave your ass.

by **two hands** December 17, 2007



3

turnkey

A complete end to end solution requiring no additional effort.

The computer came with a tunrkey installation.

by **FyrFytr** October 13, 2003



- turnmire
- turn my bluelights on
- Turn my FaceBook the other way
- Turn my swag on
- Turn n' Burn
- turno
- turnock
- Turn off
- Turn off-offer
- turn off phone
- Turn of Shame
- turn on
- Turnonable
- turn on a penny
- Turn One Out By Hand
- turn on/off
- turn on the Cosby Show
- "Turn on the hate"
- Turn on the water works
- turn on, tune in, drop out

© 1999-2015 Urban Dictionary®

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[PRIVACY](#)

[FEEDBACK](#)

[REMOVE](#)

[ADVERTISE](#)

[API](#)

EXHIBIT E

Generated on: This page was generated by TSDR on 2015-02-13 11:40:23 EST

Mark: TURN-KEY VACATION RENTALS

TURN-KEY VACATION RENTALS

US Serial Number: 86477775

Application Filing Date: Dec. 11, 2014

Filed as TEAS Plus: Yes

Currently TEAS Plus: Yes

Register: Principal

Mark Type: Service Mark

Status: New application will be assigned to an examining attorney approximately 3 months after filing date.

Status Date: Dec. 16, 2014

Mark Information

Mark Literal Elements: TURN-KEY VACATION RENTALS

Standard Character Claim: Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type: 4 - STANDARD CHARACTER MARK

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis (()) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: Providing information in the field of real estate via the Internet; Providing real estate listings via the Internet; Real estate management of vacation homes; Real estate services, namely, rental of vacation homes; Real estate services, namely, rental of vacation homes, condominiums, cabins, and villas using pay per click advertising on a global computer network; Real estate services, namely, vacation home rental management services

International Class(es): 036 - Primary Class

U.S Class(es): 100, 101, 102

Class Status: ACTIVE

Basis: 1(a)

First Use: Feb. 27, 2012

Use in Commerce: Oct. 01, 2014

Basis Information (Case Level)

Filed Use: Yes

Currently Use: Yes

Amended Use: No

Filed ITU: No

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: TURN-KEY VACATION RENTALS, INC.

Owner Address: 702 Mangrove Ave., Suite 103
Chico, CALIFORNIA 95926
UNITED STATES

Legal Entity Type: CORPORATION

State or Country Where Organized: CALIFORNIA

Attorney/Correspondence Information

Attorney of Record

Attorney Name: David Adler

Attorney Primary Email Address: David@adler-law.com

Attorney Email Authorized: Yes

Correspondent

Correspondent Name/Address: DAVID ADLER
ADLER LAW GROUP

300 SAUNDERS RD STE 100
RIVERWOODS, ILLINOIS 60015-5708
UNITED STATES

Phone: (866) 734-2568

Fax: (866) 734-2568

Correspondent e-mail: David@adler-law.com

Correspondent e-mail Yes
Authorized:

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Dec. 16, 2014	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Dec. 15, 2014	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: NEW APPLICATION PROCESSING

Date in Location: Dec. 16, 2014

Proceedings

Summary

Number of Proceedings: 1

Type of Proceeding: Cancellation

Proceeding Number: [92060599](#)

Filing Date: Dec 24, 2014

Status: Pending

Status Date: Dec 24, 2014

Interlocutory Attorney: YONG OH (RICHARD) KIM

Defendant

Name: Thomas Clark

Correspondent Address: THOMAS CLARK
1571 CHESTNUT ST
SAN FRANCISCO CA , 94123
UNITED STATES

Associated marks

Mark	Application Status	Serial Number	Registration Number
TURNKEY	Cancellation Pending	85763978	4340236

Plaintiff(s)

Name: Turn-Key Vacation Rentals, Inc.

Correspondent Address: DAVID M ADLER
ADLER LAW GROUP
300 SAUNDERS ROAD, SUITE 100
RIVERWOODS IL , 60015
UNITED STATES

Correspondent e-mail: David@adler-law.com

Associated marks

Mark	Application Status	Serial Number	Registration Number
TURN-KEY VACATION RENTALS	New Application - Record Initialized Not Assigned to Examiner	86477775	

Prosecution History

Entry Number	History Text	Date	Due Date
1	FILED AND FEE	Dec 24, 2014	
2	NOTICE AND TRIAL DATES SENT; ANSWER DUE:	Jan 05, 2015	Feb 14, 2015
3	PENDING, INSTITUTED	Jan 05, 2015	