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

Proceeding	91240654
Party	Plaintiff The Christian Broadcasting Network, Inc.
Correspondence Address	PATRICK J ARNOLD JR MCANDREWS HELD & MALLOY LTD 500 W MADISON ST, 34TH FL CHICAGO, IL 60661 UNITED STATES trademarks@mcandrews-ip.com, e@mcandrews-ip.com, parnold@mcandrews-ip.com, dscott@mcandrews-ip.com, bper- sichetti@mcandrews-ip.com 312-775-8000
Submission	Plaintiff's Notice of Reliance
Filer's Name	Patrick J. Arnold Jr.
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Signature	/Patrick J. Arnold Jr./
Date	04/23/2019
Attachments	CBN Notice of Filing 3-13-19 Notice of Reliance.pdf(531578 bytes)

Date: April 23, 2019

Respectfully submitted,

/Patrick J. Arnold Jr./

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CERTIFICATE OF SERVICE

I hereby certify that, on the date indicated below, a copy of the foregoing was served by e-mail on counsel for Applicant, Lynn E. Rzonca and Jessica Watkins, Ballard Spahr LLP, rzoncal@ballardspahr.com and watkinsjh@ballardspahr.com.

Date: April 23, 2019

By: /Patrick J. Arnold Jr./
Patrick J. Arnold Jr.

EXHIBIT A

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

Trademark Application Serial Nos.
79/197,514 and 79/975,367
For the mark BCBN

The Christian Broadcasting Network, Inc.,
Opposer,

Opposition No. 91240654

v.

Delicious Ltd.,
Applicant.

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**OPPOSER’S NOTICE OF RELIANCE AND
REQUEST TO TAKE JUDICIAL NOTICE**

1. Opposer hereby provides notice of reliance upon the following six of Opposer’s pleaded registrations, namely: Reg. Nos. 1,108,225; 2,087,580; 2,520,307; 3,799,169; 5,286,207; and 5,321,978. Pursuant to 37 C.F.R. § 2.122(d), copies of each of these registrations, along with, for each registration, current copies of information from the electronic database records of the Office showing the current status and title of the registration, are attached as Exhibit 1. These registrations will be relied upon to demonstrate the likelihood of confusion with Applicant’s mark.
2. Opposer also hereby provides notice of reliance, pursuant to 37 C.F.R. § 2.122(e), upon pages printed from the Internet from the website accessible at www.cbn.com, attached as Exhibit 2. Each of the pages that print out with URL and date information is followed by better quality screenshots of the printout. These pages are relevant to show Opposer’s variety and extent of use of the marks upon which it relies in this Opposition.

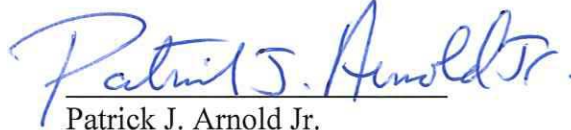
3. Pursuant to 37 C.F.R. §2.122(a) and Fed.R.Evid. 201, Opposer also requests that the Board take judicial notice of the fact that it is common for television broadcasting companies to combine new letters with its main trademark in connection with affiliated television broadcasts. As examples, and also pursuant to 37 C.F.R. §2.122(e), Opposer hereby provides notice of reliance upon pages printed from the Internet from the following websites, all of which are attached as Exhibit 3:

- www.cbs.com [CBS's home page]
- www.streamingtvguides.com/Channel/CBSSN [CBSSN, a sports channel affiliated with CBS]
- www.nbc.com [NBC's home page]
- www.cnbc.com [CNBC, affiliated with NBC]
- www.msnbc.com [MSNBC, affiliated with NBC]
- www.nbcsports.com [NBCSN, a sports broadcasting network, also affiliated with NBC]
- www.espn.com [ESPN's home page]
- www.directtv.com/channels/ESPNU-HD [ESPNU, a college sports channel affiliated with ESPN]

Each of the pages that print out with URL and date information is followed by better quality screenshots of the printout. These pages are relevant to demonstrating the likelihood of confusion with Applicant's mark.

Date: March 13, 2019

Respectfully submitted,

A handwritten signature in blue ink that reads "Patrick J. Arnold Jr." with a horizontal line underneath the name.

Patrick J. Arnold Jr.

Bryce R. Persichetti

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Date: March 13, 2019

By: Patrick J. Arnold Jr.
Patrick J. Arnold Jr.