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Filing date: 01/22/2019

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

Proceeding	91241083
Party	Plaintiff Rebecca Curtin
Correspondence Address	LOLETTA DARDEN SUFFOLK UNIVERSITY IP & ENTREPRENEURSHIP CLINIC 120 TREMONT STREET SUITE 150 BOSTON, MA 02108 UNITED STATES Idarden@suffolk.edu, cl.rgordon4@suffolk.edu, jstringham@wnlaw.com, mbar- low@wnlaw.com 617-305-1641
Submission	Motion to Amend Pleading/Amended Pleading
Filer's Name	Loletta DARDEN TMCP-SUF
Filer's email	ldarden@suffolk.edu
Signature	/Loletta DARDEN/
Date	01/22/2019
Attachments	Motion in Support of Second Amended Notice of Oppositon WN edit- sIPECedt.pdf(152071 bytes) Second Amended Notice of Oppositionrev2.pdf(179164 bytes) Exhibits a-c Second Amended Notice of Opposition.pdf(4781125 bytes) Exhibits d-z to Second Amended Notice rev1.pdf(3375836 bytes)

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

No.:
Serial No.: 87690863
mber 20, 2017
April 10, 2018
PUNZEL

<u>OPPOSER'S MOTION TO FILE A</u> SECOND AMENDED NOTICE OF OPPOSITION

I. MOTION TO AMEND

Pursuant to Federal Rule of Civil Procedure 15(a)(1)(B) and 37 C.F.R. §2.107, Opposer hereby moves the Board for leave to file a Second Amended Notice of Opposition (the "Second Amended Notice") to re-plead her claims that the mark RAPUNZEL is generic for dolls and action figures. Opposer also seeks leave to re-plead her fraud claim and that Applicant committed Fraud on the Trademark Office in filing the Application for registration in the first instance.

The Board in its Order of December 28, 2018, stated that since "Opposer has sufficiently alleged standing to pursue her claims that RAPUNZEL is merely descriptive of the identified goods, Opposer has the right to assert any other grounds in the opposition. Corporacion Habanos SA v. Rodriquez, 99 USPQ2d 1873, 1877 (TTAB 2011)." Paper No. 12, page 9. The Board in its order allowed Opposer until January 21, 2019, to submit a second amended notice of opposition sufficiently pleading the fraud and genericness claims. Because January 21, 2019, was a federal holiday, Opposer filed the Amended Notice of Opposition, the next

business day, January 22, 2019. The Second Amended Notice of Opposition, filed concurrently herewith, does not assert any new grounds that were not present in the original Notice of Opposition.

Respectfully submitted,

Rebecca Curtin, the Opposer

By: <u>/Loletta Darden/</u> on January 22, 2019 Loletta Darden TMCP-SUF Attorney for Opposer Professor and Director Suffolk University Intellectual Property and Entrepreneurship Clinic 120 Tremont St, Boston, MA 02108 Idarden@suffolk.edu

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John C. Stringham, Reg. No. 40,831 Matthew A. Barlow WORKMAN | NYDEGGER 60 East South Temple, Suite 1000 Salt Lake City, UT 84111 Telephone: (801) 533-9800 Fax: (801) 328-1707 jstringham@wnlaw.com mbarlow@wnlaw.com

CERTIFICATE OF SERVICE

I, Loletta Darden, hereby certify that a true and correct copy of the foregoing Motion to File a Second Amended Notice of Opposition was served on counsel for Applicant at the following address:

Erik M. Pelton Erik M. Pelton & Associates, PLLC PO Box 100637 Arlington, Virginia 22210

Executed on January 22, 2019 at Boston, Massachusetts

//Loletta Darden/ Loletta Darden TMCP-SUF Attorney for Opposer Professor and Director Suffolk University Intellectual Property and Entrepreneurship Clinic 120 Tremont St Boston, MA 02108 Idarden@suffolk.edu **EXHIBIT 1**

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

Rebecca Curtin,)	
Opposer,)	Opposition No.:
)	91241083
V.)	Application Serial No.: 87690863
)	Filed: November 20, 2017
United Trademark Holdings, Inc.,)	Published: April 10, 2018
Applicant)	Mark: RAPUNZEL

SECOND AMENDED NOTICE OF OPPOSITION

To the Honorable Commissioner of Patents and Trademarks:

Opposer, Rebecca Curtin, believes that she will be damaged by registration of the mark shown in Serial No. 87690863, published for opposition on April 10, 2018, and hereby opposes the same. As grounds for opposition, Opposer alleges as follows in her Second Amended Notice of Opposition:

1. Upon information and belief, on November 20, 2017, Applicant, United Trademark Holdings, Inc., filed Application Serial No. 87690863 for registration of the mark RAPUNZEL in International Class 028 for "Dolls; toy figures".

2. Upon information and belief, the name "RAPUNZEL" is one synonymous with the name of a well-known childhood fairytale character. The tale of Rapunzel is integrally part of human culture and experience as evidenced by adaptations existing from Proto-Indo- European roots in the Neolithic era, potentially 6,000 years old.

3. Upon information and belief, the Grimm Brothers are credited with the modern adaptation of the Rapunzel fairy tale as published in The Grimm Brothers' Children's and Household Tales, originally published in 1812.

4. The Grimm Brothers' adaptation stemmed from a number of influences, including: Rapunzel by Friedrich Schutz, published in 1790; Persinette by Charlotte-Rose de Caumont de La 1 Force, published in 1698; and Petrosinella in the Pentamerone or Lo Cunto de li Cunti, "Story of Stories" by Giambatista Basile, published in 1634.

5. The plot, character, and overtones offered by the Rapunzel tale stretch across cultural boundaries outside of Western Europe, taking influence from the Baltic solar goddess, Saulé, held captive in a tower by a king. The Persian epic poem Shanahmeh, written between 977 and 1010 C.E. by Ferdowsi also includes a character named Rudāba, who allows her lover to climb her hair up a tower. Additionally, some influence is attributed to the tale of Saint Barbara in the Christian rite.

6. Upon information and belief, Applicant seeks to register as a mark a name that has a preestablished value and meaning to consumers. Upon information and belief, consumers will recognize "Rapunzel" as the name of a fairy tale character known in written and oral traditions in various forms for thousands of years.

7. Applicant has not sought to add any distinguishing elements to the name "Rapunzel" in the way it did with its "ZOMBIE RAPUNZEL" mark, Reg. No. 5027339.

8. Applicant's mark fails to function as a trademark under Sections 1, 2 and 45 of the Trademark Act (15 U.S.C. §§1051, 1052 and 1127), as it is purely informational and highly descriptive, and a generic descriptor of Applicant's goods. Additionally, Applicant's mark is merely informational under section 2(e)(1) of the Trademark Act (15 U.S.C.§1052(e)(1)) in that it merely describes and names a well-known fictional character. In that sense, the "mark conveys an immediate idea of an ingredient, quality, characteristic, feature, function, purpose or use of the goods." TMEP §1209.01(b). The public knows Rapunzel as the character name of a fictional fairy tale character, not as a source indicator. Trademark protection may be precluded in those instances where the proposed mark does not function as a source indicator. In the case of Rapunzel, consumers are accustomed to encountering the name in an associational or informational manner unconnected with any goods/services. Here, Applicant is attempting to snatch the name Rapunzel out of the public domain, which would prevent others from referring to their Rapunzel dolls, characters and toy figures by their true name -- Rapunzel. As a result, the Board should deny registration of the opposed mark under Section 2(e)(1) of the Trademark Act (15 U.S.C. §1052(e)(1)) as well as Sections 1 and 45 of the Trademark Act (15 U.S.C. §§1051 and 1127) as being generic and failing to function as a trademark and for fraud in the application.

9. Fairy tale characters, including Rapunzel, are typically represented as dolls or television or movie character. *See* Susan Brewer, *Famous Character Dolls, Chapter 3 –Dolls Representing Characters in Fairy Tales and Nursery Rhymes*, p. 36 (Pen & Sword Books, Ltd 2013)(Fairy-tale dolls are also popular with designers and manufactures); *see also Realms of Gold, Inc.: Stuffed Animal Repair and Fairy Tale Dolls*, available online at <u>https://realmsofgold.com/fairy-tale-dolls/</u>, (stating that you can find dolls on their website in two ways: (1) by the story that inspired them or

(2) alphabetical by character name). **EXHIBIT X**; *see also Realms of gold, Inc.: German Fairy Tales of the Brothers Grimm* (showing a link identified as "Rapunzel." Upon clicking the link one is taken to a page that says "Rapunzel is a traditional doll based on a fairy tale from the Brothers Grimm. She is available with normal legs, or with velcro (sic) pouch legs for hiding secrets. She is approximately 15" tall and is shown with pouch legs and a velvet dress. Part of her hair is a thin braid which wraps around her head, or can be "let down." She comes with her story in a small, handmade book."). **EXHIBIT Y**.

- 10. Numerous vendors of dolls refer to a category of dolls as Rapunzel:
 - a. ShopDisney.com is, *inter alia*, an internet business selling a doll with long blonde hair and referring to the doll as a Rapunzel Doll. **Exhibit D and E**.
 - b. Target.com is, *inter alia*, an internet business selling a doll with long blonde hair and referring to the doll as a Rapunzel Doll. **Exhibit F and G**.
 - c. Amazon.com is, *inter alia*, an internet business selling a doll with long blonde hair made by Disney. Amazon.com refers to the doll as a Rapunzel Doll.
 Exhibit H.
 - d. Amazon.com as referred to in Paragraph (c) also sells a doll identified as "Barbie as Princess Rapunzel African American" **Exhibit I**.
 - e. Ebay.com is, *inter alia*, an internet platform where consumers can buy and sell goods. Ebay.com is selling dolls with long blonde hair referring to them as Rapunzel dolls. **Exhibit J**.
 - f. Ebay.com as referred to in Paragraph (e) is also selling a doll identified as "Barbie Doll Rapunzel Cut and Style 2008." **Exhibit J**.
 - g. Argos.co.uk is, *inter alia*, an internet business selling a doll with long blonde hair and referring to the doll as a Rapunzel Doll. **Exhibit K**.
 - h. Ebay.com is, *inter alia*, an internet platform where consumers can buy and sell goods. Ebay.com is selling Rapunzel dolls dating back to 1997. Exhibit Q.
 - Etsy.com is an internet platform where consumers can buy and sell goods.
 One Etsy listing describes a doll as "African Princess Rapunzel Doll." Exhibit W.

11. Dictionary definitions, databases, websites and online publications, including video, defining Rapunzel as the name of a known fairy tale character and embodied as a doll:

- a. Wikipedia.org is, *inter alia*, a web based encyclopedia and refers to Rapunzel as a German fairy tale with long blonde hair. **Exhibit L**.
- b. Dictionary.com is, *inter alia*, a web based dictionary that refers to Rapunzel as a German fairy tale about a young woman with long hair. **Exhibit M**.
- c. USAToday.com is, *inter alia*, an online newspaper. An article by usatoday.com is written about Disney's top 15 toys of 2018. One gift included in the top 15 is the Disney

Princess Gift Set. One doll included in this set is the Rapunzel doll. Exhibit N.

- d. Trendhunter.com is, *inter alia*, an online community for trend hunting and innovation. An article by trednhunter.com is written about the dozens of Rapunzel dolls that have been released over the years. **Exhibit O**.
- e. Today.com is, *inter alia*, an online forum providing news stories and videos. An article by Today.com is written about the hottest holiday toys. One toy included in this article is the Rapunzel doll. Exhibit P.
- f. Pinterest.com is, *inter alia*, a social media web company. Pinterest.com lists items similar to a vintage Rapunzel doll from the 1960s. **Exhibit R**.
- g. Gumtree.com is, *inter alia*, a British online advertisement and community website. Gumtree.com lists collectable Rapunzel dolls. **Exhibit S and T**.
- h. Buzzfeed.com is, *inter alia*, an online media and news company. Buzzfeed.com includes the Rapunzel Barbie in an article about dolls from the 80s and 90s that are worth a fortune now. **Exhibit U**.
- Picclick.com is, *inter alia*, an online site that allows consumers to browse ebay.com.
 Picclick.com lists a vintage Rapunzel doll from the 1970s. Exhibit V.
- j. **Exhibit Z** includes miscellaneous references to Rapunzel as a category of dolls:
 - a. <u>https://www.youtube.com/watch?v=3_FhfPT6ce0</u> "Mila loves her Rapunzel"
 - b. Excerpts from *The Barbie Thang*, available online at <u>https://www.berkeleyparentsnetwork.org/advice/playing/barbiethang</u>
 - c. <u>http://www.raisingmyboys.net/2013/10/</u> ("I'm hoping to find a Rapunzel for me.").

12. As a result of the widespread use of the word Rapunzel in connection fairy tale princess dolls, the name Rapunzel is the name consumers have come to know and use to identify this category of dolls known simply as Rapunzel or Rapunzel dolls.

13. Applicant's attempted registration of RAPUNZEL is not the case of calling a rose by another name and it still smelling as sweet. The name Rapunzel is the generic name for dolls personifying the fairytale character, particularly a princess with inordinately long hair. When the use of a would-be trademark falls within the "heartland" of its common usage, the would-be mark fails to function as a trademark. TMEP §1209.01(c).

14. If Applicant's registration issues, consumers would face mislabeled Rapunzel goods or have to suffer through ambiguous descriptions such as "the maiden in the tower" to find Rapunzel merchandise. As a result, the Board should deny registration of the opposed mark under Sections 1, 2, and 45 (15 U.S.C. §§1051, 1052 and 1127) as being the generic identifier of a fictional fairy tale character that fails to distinguish the goods of the Applicant from the goods of others.

15. Applicant's mark is also functional under section 2(e)(5) of the Trademark Act

(15 U.S.C. \$1052(e)(5)) in that it would give Applicant a competitive advantage over other doll makers. Like a color-coding on a pill, or the phrase "Merry Christmas" on wrapping paper, the name Rapunzel on a doll makes that doll better than other dolls by giving consumers important information about how to use the product—here, about the possibilities for play with the doll engaging with the well-known fairy tale as a built-in "back story" for the character. TMEP \$1202.02(a)(vi). The name Rapunzel is the only moniker by which the well-known fictional character can be identified. Rapunzel functionally identifies the fictional fairy tale character Rapunzel. There is no other practicable way to identify the character. As evidence of the competitive need to use the name, others in the toy industry have used and continue to use the name Rapunzel to identify their Rapunzel character dolls. See **Exhibit A**.¹

16. Opposer, Rebecca Curtin, is a professor of law teaching trademark law, and is also a consumer who participates amongst other consumers in the marketplace for dolls and toy figures of fairytale characters, including Rapunzel. Opposer is a mother of a young girl who has purchased and continues to purchase dolls, including fairy tale dolls. As such, Opposer has a legitimate interest in the outcome of this proceeding. By allowing an individual private company to trademark the name of a famous fairy tale character in the public domain, Opposer and other consumers will be denied access to healthy marketplace competition for products that represent the well-known fictional character. Opposer and other consumers will also likely face an increased cost of goods associated with Rapunzel merchandise, given the lack of competition. Opposer believes that a trademark registration in the fairy tale, crowding out the substantial social benefit of having diverse interpreters of the fairy tale's legacy. Opposer and other consumers will also be denied access to classic, already existing, Rapunzel merchandise whose sale may be precluded if Applicant receives a registration for the name "Rapunzel."

17. Further, Opposer is a member of a community of purchasers of fairy tale dolls and toys that will be similarly damaged by registration of the subject application. Opposer believes that this community includes hundreds of people who purchase fairy tale dolls and toys that will potentially be damaged if the subject mark is registered. Opposer has documented contact with several organizations and interest groups which have expressed their belief that allowing the subject mark to be registered would cause damage. Opposer has also obtained more than 171 petition signatures from other individual consumers who share Opposer's belief, with 157 of those petition signers residing in the United States. *See* **Exhibit B** attached hereto. A number of the signatures include a statement about the damage that would result from allowing the subject mark to be registered, such as the following:

¹ We understand that the Board in its ruling of December 28, 2018, dismissed the functionality claim under 2(e)(5) with prejudice; however, to preserve the right to appeal at a later date the dismissal the 2(e)(5) issue as set forth in the First Amended Notice of Opposition, the claim under 2(e)(5) is included the Second Amended Complaint. *See* TBMP 507.02.

"I think creativity and diversity in toys is critical to the development of children's imagination. If only one company has the right to make and market toys under the name Rapunzel, it would limit the diversity of dolls and toys."

"Over-reaching by one company is not in the interest of consumers generally. It would also unnecessarily limit the variety, expansion and inclusiveness of a character and story known to many generations and cultures in ways that may vary with the passage of time and the evolution of this "timeless" story and character."

"It was very important to me to have different types of stories and different images of fairy tale characters to read/show to my two daughters when they were young. It is critical that different interpretations of these characters and images are available."

"This is a fairy tale character who's been in the public domain for generations. We should maintain the ability to create diverse depictions."

"We have grandchildren who enjoy the traditional stories and we want them to have the full range of experiences that an open and free market will provide."

"Toymakers should be able to use age old fairy tale characters without fear of trademark infringement."

18. For the reasons described above, Rebecca Curtin has a legitimate real interest in the outcome of this proceeding and a reasonable basis for her belief in damage.

19. Additionally, upon information and belief, the name "Rapunzel" has been associated with dolls and toys depicting the well-known fairy tale figure since at least as early as 1890, and continually since that time.² Indeed, as demonstrated by the attached declarations from the Organization of Transformative Works, a non-profit organization that protects and defends creative works from commercial exploitation and legal challenge, and Jack Zipes, a scholar of

Series/312163540644?hash=item48ae659ea4:g:WvsAAOSwdxZbJSgK

² See e.g., https://www.rubylane.com/item/1476300-219/Amazing-antique-french-all-bisque-musical?search=1, https://www.etsy.com/listing/577372471/vintage-1950s-jigsaw-puzzles-set-

of?ga_order=most_relevant&ga_search_type=vintage&ga_view_type=gallery&ga_search_query=rapunzel&ref=sr_ gal lery-2-44, https://www.etsy.com/listing/235827439/vintage-rapunzel-doll-rare-1960s-hong?ref=related-0, https://www.ebay.com/itm/Vintage-1968-Matel-Storybook-Kiddles-Sweethearts-Rapunzel-w-All-Pieces-Good/192576414694?hash=item2cd672e3e6:g:DnQAAOSwIrVbLHi4, https://www.rubylane.com/item/161143-A5419/Cybis-x22Rapunzelx22-Pink-Closed-Ltd-Edition?search=1, https://www.ebay.com/itm/Effanbee-Doll-Rapunzel-Vintage-1975-11-1199-Original-Box/173349313246?hash=item285c6c9ade:g:ofQAAOSwqHdaxVrv, https://www.ebay.com/itm/Barbie-As-Rapunzel-Doll-New-in-Box-1994-Children-s-Collector-

fairy tales and former professor, the RAPUNZEL name has existed in the public domain as a generic descriptor of a specific fairy tale princess (including on toys and dolls) for numerous decades. *See* Exhibit C, attached hereto.

20. On November 20, 2017, in connection with the trademark application for the mark RAPUNZEL, Applicant made a sworn statement that Applicant made its first use of the mark at least as early as August 2017, and that "to the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive."

21. As demonstrated herein, third parties have made use of the mark RAPUNZEL in connection with dolls and toy figures, and those rights to use the mark Rapunzel in connection with dolls and toy figures are superior to Applicant's rights in the mark.

22. Upon information and belief, Applicant knew that these third parties had rights in the mark superior to Applicant's, and either believed that a likelihood of confusion would result from Applicant's use of its mark or had no reasonable basis for believing otherwise.

23. Applicant, in failing to disclose these facts to the U.S. Patent and Trademark Office, intended to procure a registration to which it was not entitled.

24. As a direct result of Applicant's action listed above, Applicant has committed fraud on the U.S. Patent and Trademark Office.

WHEREFORE, the Opposer, Rebecca Curtin, prays that said application Serial No. 87690863 be rejected, and that no registration be issued thereon to the Applicant, United Trademark Holdings, Inc. and that this opposition be sustained in favor of the Opposer.

Respectfully submitted,

Loletta Darden TMCP-SUF Professor and Director, Suffolk University Intellectual Property & Entrepreneurship Clinic 120 Tremont St, Boston, MA 02108 Idarden@suffolk.edu Benjamin Virgin, LT-5,884 Christopher LeBlanc, LT-5,882 SJC Rule 3:03 Student Attorneys Suffolk University Law School Intellectual Property & Entrepreneurship Clinic 120 Tremont St Boston, MA 02108

John C. Stringham, Reg. No. 40,831 Matthew A. Barlow WORKMAN | NYDEGGER 60 East South Temple, Suite 1000 Salt Lake City, UT 84111 Telephone: (801) 533-9800 Fax: (801) 328-1707 jstringham@wnlaw.com mbarlow@wnlaw.com

Attorneys for Opposer, Rebecca Curtin January 22, 2019

CERTIFICATE OF SERVICE

I, Loletta Darden, hereby certify that a true and correct copy of the foregoing Second Amended Notice of Opposition was served on counsel for Applicant at the following address:

Erik M. Pelton Erik M. Pelton & Associates, PLLC PO Box 100637 Arlington, Virginia 22210

Executed on January 22, 2019 at Boston, Massachusetts

//Loletta Darden/ Loletta Darden TMCP-SUF Attorney for Opposer Professor and Director Suffolk University Intellectual Property and Entrepreneurship Clinic 120 Tremont St Boston, MA 02108 Idarden@suffolk.edu

EXHIBIT A



Google rapunzel dolls

All





Settings Tools

Sponsored

Q



Shop for rapunzel dolls on Google



Rapunzel Classic Doll with Pascal... \$16.95 shopDisney.com Special offer



Disney Collection

Rapunzel Classi...

\$15.00

JCPenney

In store



Rapunzel and Cassandra Dolls... \$14.99 shopDisney.com 33% price drop



Disney Princess

(22)

\$25.49

Target



>

Disney Princess Tangled Glow N' Tangled Disney... \$249.99 **Google Express**







More images for rapunzel dolls



Report images

Amazon.com: Disney Tangled Classic Rapunzel Doll - 12": Toys ... https://www.amazon.com/Disney-Tangled-Classic-Rapunzel-Doll/dp/B005GAY294 -Rating: 3.8 - 49 reviews

Embark on exciting adventures during playtime with Rapunzel! Fully poseable, this Rapunzel doll comes with her signature long golden hair that you can braid over and over again like the little girls at the town festival in Tangled! Collect with Tangled Flynn Rider Doll and Tangled Rapunzel Wardrobe and Friends Set, each ...

Rapunzel Doll: Amazon.com

https://www.amazon.com/slp/rapunzel-doll/9vzwf5gkukd86cz Buy products related to **rapunzel doll** products and see what customers say about **rapunzel doll** products on Amazon.com ✓ FREE DELIVERY possible on eligible purchases.

Rapunzel Dolls - Walmart

https://www.walmart.com/c/kp/rapunzel-dolls -

Fisher-Price Little People Disney Princess **Rapunzel's** Boat, Gift set includes 6 Disney Princess Wheelies vehicles, featuring Disney princesses Ariel, snow white,.., By FisherPrice, Sold & Shipped by Breezes. Product - Disney Princess **Rapunzel** Wedding Party Small **Doll**. Product Image. Disney Princess **Rapunzel** Wedding ...

rapunzel doll : Target

https://www.target.com/s/rapunzel+doll -

Shop for **rapunzel doll** online at Target. Free shipping on purchases over \$35 and save 5% every day with your Target REDcard.

Rapunzel Toys - Dolls, Games & Movies - Toys"R"Us

https://www.toysrus.com/products/rapunzel-toys.jsp -Let your hair down and enjoy the enchanting **Rapunzel** toys from Toys"R"Us. Explore **Rapunzel** games, dazzling dresses, playsets, movies and more for your princess. You visited this page on 4/26/18.

Rapunzel Doll | eBay

www.ebay.com/bhp/rapunzel-doll
Find great deals on eBay for Rapunzel Doll in Disney Dolls. Shop with confidence.

Tangled | shopDisney

https://www.shopdisney.com/movies-shows/disney/tangled Embark on fun **Rapunzei** adventures with Disney's Tangled merchandise. Shop Tangled clothes, **dolls**, toys and more only at the official shopDisney.

Rapunzel Adventure Doll - Tangled The Series - 10" | shopDisney

https://www.shopdisney.com/rapunzel-adventure-doll-tangled-the-series-10-1429534 Rating: 4.1 - 15 reviews - \$19.95 - In stock Ready for adventure, frying pan in hand, **Rapunzel** has the wind in her long, golden, just-waiting-for-youto-style-it hair. Plus, Pascal is along for the ride!

Disney Store TANGLED RAPUNZEL Doll & PASCAL REVIEW | 2016 ...

https://www.youtube.com/watch?v=uy-Krldckcl ▼ Jul 2, 2016 - Uploaded by DisneyMonster

https://www.google.com/search?g=rabunzel+dolls&gg=Rap&ags=chrome 1 69i57i69i59i35i39i0l3 4229i0i8&sourceid=chrome&ie=UTF-8



https://www.google.com/search?g=ranunzel+dolls&tbm=isch&tbg=u&source=univ&sa=X&ved=0ahUKEwito4K70_naAhWsmeAKHcREAccO7AkluwE&bive=1534&bih=746

1/3





EXHIBIT B



START A PETITION

📰 BROWSE 🛛 sign in



Free Rapunzel from the Trademark Tower

by: <u>Rebecca Curtin</u> target: United States Patent and Trademark Office

171 SUPPORTERS

5,000 GOAL

A private company recently applied for a trademark in the name "Rapunzel" for dolls and toy figures. We believe that giving one, single company the exclusive right to market dolls and toy figures under the name "Rapunzel" damages consumers by restricting competition for products that represent the well-known fairy tale character. Giving one company a trademark registration for "Rapunzel" dolls would make it harder for other toymakers and fans of the fairy tale to market and sell toys that interpret the fairy tale's legacy and it would make it harder for consumers to find Rapunzel toys not made by that one trademark holder.

The "Rapunzel" name is synonymous with the toys that depict the fairy tale character--when we see that name alone, it evokes the fairy tale we know and love, not any one single company.

A trademark registration like this would be a powerful tool to discourage competitors from even trying to market toys that engage with the ancient story of the maiden in the tower--and why should that be? Rapunzel already belongs to everyone and we'd like to see lots of different companies and fans of the fairy tale have the opportunity to engage with the character in the toy marketplace without fear of liability for trademark infringement.

We believe there should be free, open, and fair competition in the toy market for the fairy tale magic handed down to us from the past.

David N.	いっとう きょうしん とうせいしん さんしん かいかくしんしゃしん 行行
Jtah	4 days ago
SEND 苯	
Matthew H.	
California	4 days ago
This has been in the public domain for thousands of y	/ears. It can't be plucked out
10W.	
SEND 🛪	
Krysteen D.	
Washington	6 days ago
SEND 🖈	
Ding G.	
British Columbia	6 days ago
SEND 🗙	
Adriana A.	
Adriana A. Florida	9 days ago
이 이야기는 지원을 수 없는 것이 없는 것을 알았는 것 수 없는 것이 이 것 수 있다. 수 있는 것을 바라	
Florida	
Florida infringing on other's rift to use a singular word is wro SEND ★	
Florida infringing on other's rift to use a singular word is wro SEND ★ name not displayed	ng
Florida infringing on other's rift to use a singular word is wro SEND 🛣 name not displayed Maine	ng
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Florida infringing on other's rift to use a singular word is wro SEND * name not displayed Maine David L. Washington Folklore and fairytales, such as Rapunzel, should be f wants to—and definitely not locked up by gatekeepe	ng 10 days ago 10 days ago 10 days ago free to use for anyone who
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Kristen P.	
Florida SEND 🖈	10 days ago
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Delaware	11 days aga
Rozalynd M. _{Texas}	11 days age
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Mollie H. Massachusetts	11 days age
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Kimberley C. Washington	12 days ago
Rapunzel is a well known name and fairy tale. It is word so common. And it prevents others from usir only person who should be able to own it is the pe	g it for future. It is a fairy tale, the
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Susan S. Virginia	12 days ag
Rapunzel is an old fairy tale. No one should be ab SEND 🖈	le to trademark the name now.
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Valerie A.	

petition: Free Rapunzel from the Trademark Tower

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lex B. Intario	12 days ago
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petition: Free Rapunzel from the Trademark Tower

Karen W. Indiana	13 days ago
l'm an author, a reader, a mother.	
SEND 🖈	
name not displayed Florida	13 days ago
No one should own a word that essentially belong others from being able to compete fairly in the toy	
Ryan S. Rhode Island	13 days ago
SEND *	
name not displayed Colorado	13 days aga
If they can't come up with something original and shouldn't qualify for a trademark.	distinctive, like "Barbie," then they
Renee R. Texas	13 days ago
No character name that wasn't created by the cor the company.	npany should be trademarked to
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Marion H. Germany	13 days ago
Germany This is a German fairytale figure, LONG before ma trademark characters that have been around for	ovies annexed it. You cannot
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Heather O. California

13 days ago

The attempted "ownership" of words is a dangerous and unacceptable new trend that blankets virtually all industries and effectively seeks to remove those trademarked words from the English language. Serious reform is urgently needed in a digital age with so many content creators. We need to reign in the growing and illegitimate applications for frivolous trademarks that impact writers, toy makers, etc.

SEND ★

Washington

name not displayed

13 days ago

Easily recognizable words should be available for anyone to use. This is very important to those who use words in their work.

Pam S.

New York

13 days ago

13 days ago

13 days ago

14 days ago

14 days ago

Trademarks shouldn't be issued for single commonly used words. Neither should they be issued for names, characters, or objects that have been used for generations as part of popular culture. No one has the right to trademark Rapunzel. That fairy tale existed long before anyone living today was even born. Trademarks are supposed to be unique indentifiers of a product or brand. There is absolutely nothing unique about using the name Rapunzel.

SEND 🖈

Sloane H. Missouri

SEND 🖈

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Massachusetts

Sharmila M.

Massachusetts

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Aldis R.

Massachusetts SEND 🚖

Tamara K.

Queensland

SEND ★

15 days ago

Companies should not be appropriating words from the common parlance to attach to a toy thus denying its use to all others.

Christopher G. Massachusetts SEND 🖈	15 days ago
name not displayed Illinois	15 days ago
Jennifer M. Illínois This monopoly is unfair!! SEND 🛣	i5 days ago
Amy W. Virginia My little girls love Repunzel and I want them to be able to the Disney version, and all other versions SEND 🖈	15 days ago experience the folk version,
Amanda S. Massachusetts SEND ★	15 days ago
Dyane O. Massachusetts SEND 🛣	16 days ago
name not displayed Massachusetts	16 days ago
Even Hartmann F. Norway SEND 🖈	16 days ago
name not displayed Texas	16 days ago
Marie F. Massachusetts SENDX	16 days ago

ennifer L. Massachusetts	16 days ago
SEND ★	
n <mark>ame not displayed</mark> Inited Kingdom	16 days ago
Because Rapunzel is a part of a rich and much loved folklore: of She does not belong to some corporation who wants to make a character much loved for hundreds of years. No-one should bwnership of her, except the person who first created the story dead for a long time. They chose to share her with the world: r further because they saw her as a source of income.	money from her: she is or could claim and they have been
(athleen M. Dregon	17 days ago
Rapunzel and the story is very old and should not belong to 1 p	berson or 1 business.
SEND 🖈	
Kathryn F. Western Australia	17 days ago
ts a fairy tale. Part of multiple cutures. You cant put it under co	opyright when the
whole human race owns it. SEND ★	
Nancy A. Pennsylvania	17 days ago
SEND X	
Katherine T. Japan	17 days ago
You can't copyright fairytales Disney!	
SEND 🗙	
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Armed Forces Pacific	17 days ago
I'm an English Literature graduate, an artist and a parent.	
Sharon F.	
Snaron F. Victoria	17 days ago
You do mot have a monopoly on fairy tales. SEND 🖈	
	그는 것은 것으로 모습을 받았다.

United Kingdom	17 days ago
Harmony M. New Hampshire SEND	17 days ago
Jessica R. Unitéd Kingdom SEND 🖈	17 days ago
Peter M. New South Wales I am a children's author in Australia, a winner of both national a awards for my children's writing, and also a grandfather who is in a local school, sharing wonder.	an tanàna amin'ny tanàna mandritra dia kaominina dia kaominina dia kaominina dia kaominina dia kaominina dia ka
Evan F. Massachusetts SEND	17 days ago
Gloria K. California SEND ★	17 days ago
Rachel E. Montana SEND	17 days ago
Heather L. Illinois I don't wasn't only one way to envision Rapunzel. No one compo allowed to say THIS is Rapunzel. SEND X	17 days ago any should be
Brittany B. California SENDX	17 days ago
Tanya H. Florida SEND 🖈	17 days ago

leah g.	17 days app
Nevada	17 days ago
rapunzel is a fairy tale, this company did not create rapunzel and ther not be able to own the rights to it.	etore should
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Noé L.	
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Hugh D. North Carolina	17 days ago
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Allen R. Massachusetts Rapunzel belongs to all of us – not just to one company SEND ★	18 days ago
Peter C. Massachusetts SEND 🖈	18 days ago
Lisa K. Georgia SEND 🛪	18 days ago
Jody C. Massachusetts SEND 🖈	18 days ago
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Benjamin S. Massachusetts SEND 🛣	18 days ago
Quaime L. Massachusetts The protection of trademark should protect the sweat equity of i as means of walling off time-honored cultural imagery and tern SEND 🛪	(A) A group of the group of the different of the second se Second second sec
Sohini B. Massachusetts Toymakers should be able to use age old fairy tale characters w trademark infringement. SEND ★	18 days ago ithout fear of
Fynn W. United Kingdom SEND ★	19 days ago

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Aassachusetts	19 days ago
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xisted in our culture for enturies.	
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≀obert S.	
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ne full range of experiences that (an open and free market will provide.
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Aassachusetts	19 days ago
his is a fairy tale character who's	s been in the public domain for generations. We
hould maintain the ability to crea	ite diverse depictions.
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anine L. New Hampshire	19 days ago

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Laura F. Massachusetts SEND X	19 days ago
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Jessica S. Massachusetts to diversify dolls! SEND X	19 days ago
Bridgett S. Massachusetts SENDX	19 days ago
Mark L. California	19 days ago
Leah G. Massachusetts Rapunzel should be free for all creators. While a Trademan mean it won't be, in practice it has that effect because of h how expensive it is to litigate.	
Ána D. Massachusetts	19 days ago
alexandra r. New Hampshire SEND	19 days ago
Janice E. Massachusetts It was very important to me to have different types of stori fairy tale characters to read/show to my two daughters w critical that different interpretations of these characters an SEND	hen they were young. It is

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No one owns what Rapunzel looks like.	
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#### 7/3/2018

#### petition: Free Rapunzel from the Trademark Tower

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Beth F. Massachusetts	20 days ago
Not appropriate to use the name Rapunzel	
udy C. Arizona SEND ★	21 days age
Vicki M. Arizona Rapunzel should not be trademarked to a private company.	21 days age
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lulie W. Arizona Helping a friend.	21 days ag
SEND 🗲	
Marie P. Arizona SEND	21 days ag
Clarice R. Arizona	21 days ag
I believe the name "Rapunzel" should not be used by a company trademark." SEND	applying for that
Deborah M. Michigan	21 days ag
The trademark belongs to the creators, the Brothets Grimm. It do commercial entity. What is next? Trying to trademark great work: great masters?	
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Inlike Disney or Marvel, the company who wants t	가슴은 영향을 관계하는 것을 가지 않는 것을 들었다.
<b>Arizona</b>	한 가가 되는 것을 물었다. 물감하는 것을 물을 통하여 한 것을 물을 통하여 한 것을 물을 물을 통하여 한 것을 물을 물려야 한다. 한 것을 물을 통하여 한 것을 물려야 한 것을 들었다. 한 것을 물 물 물 수 있다. 한 것을 물러 들려야 한 것을 들었다. 한 것을 못했다. 것을 못했다. 것을 못했다. 것을 못했다. 한 것을 못했다. 것을 것이 같이 않다. 것을 못했다. 것을 못했다. 것을 못했다. 것을 못했다. 한 것을 못했다. 한 것을 못했다. 것을 못했다. 것을 못했다. 한 것을 못했다. 것을 못했다. 한 것을 것 같이 않았다. 것을 것을 못했다. 것을 못했다. 것을 것을 못했다. 것을 것을 것 같이 않았다. 것을 것 같이 않았다. 것을 것 같이 않았다. 것을 못했다. 것을 것 같이 않았다. 것을 못했다. 것을 못했다. 것을 못했다. 것을 것 같이 않았다. 않았다. 것을 못했다. 것을 못했 않았다. 것을 못했다. 것을 못했다. 것을 것 같이 않았다. 것을 못했다. 것을 것 같이 않았다. 것을 못했다. 것을 못했다. 것을 것 같이 않았다. 것을 못했다. 것을 것 같이 않았다. 것을 것 같이 않았다. 것을 못했다. 것을 것 같이 않았다. 것을 것 같이 않았다. 것을 것 같이 않았다. 것을 한 것 같이 않았다. 것을 것 같이 않았다. 것을 것 같이 않았다. 것을 것 같이 않았다. 않같이 않았다. 않았다. 것 않았다. 것 않았
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#### 7/3/2018

#### petition: Free Rapunzel from the Trademark Tower

Massachusetts	23 days ago
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Neel M. Massachusetts	24 days ago
Christy O. Massachusetts	24 days aga
I think creativity and diversity in to	ys is critical to the development of children's has the right to make and market toys under the
Dennis R. Massachusetts SEND 🖈	25 days ago
Karen K. Massachusetts SEND ★	25 days ago
Mark W. Massachusetts SEND ★	25 days ago
Sandra C. Massachusetts SEND ★	25 days ago
name not displayed Massachusetts	25 days ago
Karen P. Massachusetts	25 days ago
	story, most likely from Germany, at least 200 years belongs to a 21st century company trying to claim it

#### 7/3/2018

name not displayed Massachusetts This is a wonderful classic fairytale that should not be controlled by one	25 days ogo company!
Angela L. Massachusetts SEND 🖈	25 days ago
Ryan G. Massachusetts SEND 🖈	25 days ogo
Ashely R. Massachusetts SEND 🖈	25 days ago
Abigail A. Massachusetts SEND 🛪	25 days ago
Brian F. Kentucky The Trademark Office should disallow overbroad registrations.	25 days ago
S G. Puerto Rico	25 days ago

See more petitions: Media, Arts, Culture

care

SIGN PETITION
FIRST NAME
LAST NAME
EMAIL
COUNTRY
United States
STREET ADDRESS
WHY IS THIS IMPORTANT TO YOU? (optional)
Share this petition with friends!
Sign Now
🖾 don't display my name

privacy policy By signing, you accept Care2's terms of service. You can manage your email subscriptions at any time Having problems signing this? Let us know.

"The best way to predict the future is to create it!" Denis Gabor

**Start Petition** 

Start A Petition

https://www.thepetitionsite.com/379/821/847/free-rapunzel-from-the-trademark-tower/

#### petition: Free Rapunzel from the Trademark Tower

Our Promise: Welcome to Care2, the world's largest community for good. Here, you'll find over 45 million like-minded people working towards progress, kindness, and lasting impact.

**Care2 Stands Against:** bigots, bullies, science deniers, misogynists, gun lobbyists, xenophobes, the willfully ignorant, animal abusers, frackers, and other mean people. If you find yourself aligning with any of those folks, you can move along, nothing to see here.

Care2 Stands With: humanitarians, animal lovers, feminists, rabble–rousers, nature–buffs, creatives, the naturally curious, and people who really love to do the right thing. You are our people. You Care. We Care2. Petitions Home

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Activist University

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Help



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# **EXHIBIT C**

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

	X	
Rebecca Curtin,	:	
	:	Opposition No.: 91241083
Opposer,	:	
	:	Mark: RAPUNZEL
v.	:	
	:	Serial No.: 87/690863
United Trademark Holdings,	:	
	:	Published: April 10, 2018
Applicant	:	
	X	

#### **DECLARATION OF THE ORGANIZATION**

#### FOR TRANSFORMATIVE WORKS

I, Betsy Rosenblatt, declare under penalty of perjury of the laws of the United States of America, that the following statements are true and correct:

- 1. I am the Legal Chair of the Organization for Transformative Works, and I am authorized by the Organization for Transformative Works to represent it in this application.
- 2. In addition to the historic works named in the Notice of Opposition, there are numerous other works related to the Rapunzel character and story.
- 3. The Organization for Transformative Works ("OTW") is a non-profit organization established in 2007 that protects and defends fanworks from commercial exploitation and legal challenge. "Fanworks" are new creative works based on existing media; outside media fandom, the term "remix" is often used. In addition to legal advocacy, the OTW operates an online archive known as the Archive of Our Own, which has over 1.5 million registered users and receives an average of 26 million page views per day. The Archive of Our Own hosts user-created fanworks.

- 4. The Archive of Our Own allows users to search hosted works by "fandom" (that is, the source identified by the author as the basis for the work), character names, and general text search. A search indicates that the Archive of Our Own currently includes 90 works in the Rapunzel (Fairy Tale) fandom category, 1,601 works which include the character Rapunzel, and 2,581 hits for general Rapunzel searches. Based on this information, we can reasonably foresee that if the applied-for mark were registered, there could be substantial chilling of creative activity associated with transformative works related to Rapunzel. Such a chilling effect would be detrimental to the Archive of Our Own and other similar noncommercial fan outlets, as well as the for-profit outlets identified below (which are not affiliated with the OTW), and to individuals who engage in creative expression surrounding Rapunzel.
- 5. Fanfiction.net is another fanwork archive. It is not associated with the OTW, but like the Archive of Our Own, it provides a platform on which users can post their original works. A search of fanfiction.net for the word "Rapunzel" identifies 3.513 works, 144 of which are identified as being in the fandom category "Fairy Tales."
- 6. DeviantArt, an online artwork community, is another outlet used by many fans.¹ According to Similarweb.com, DeviantArt.com counts over 393.22 million web visits every year, is the 136th most visited website in the world, 74th most visited in the United States, and is the number one most popular website in the Arts and Entertainment category.² According to a search on DeviantArt's website, DeviantArt has 107,000 artworks with the keyword "Rapunzel" tagged. Over 4,000 of these are in the "Artisan Crafts" category which includes original dolls, repainted commercial dolls, costumes, jewelry, and other crafts.
- 7. As evidenced by the hundreds of Rapunzel fanworks identified above in the "Fairy Tale" category, the primary meaning of the term "Rapunzel" is as the common term for a particular category of fairy-tale character. It does not identify a source of goods or services. Rather, it is synonymous with dolls, toys, and expressive works that depict the fairy-tale character of Rapunzel. By seeking to register the term "Rapunzel" as a word mark, United Trademark Holdings ("UTH") is seeking to capitalize on a

¹ https://www.deviantart.com.

² https://www.similarweb.com/website/deviantart.com.

commonly recognized character and the goodwill associated with that character. The Applicant has added no value, creativity, or labor to the mark as it previously stood. This application is an intentional, egregious skirting of the public policy, intention, and express wording of trademark law. To allow the Applicant the rights to the Rapunzel name would allow UTH to chill the creativity of fans, creators of expressive works, small retailers, and the public, who previously sought and were able to make, share, and sell products related to this historic famous fairy-tale character by identifying them by the generic term "Rapunzel."

The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all the statements made of her own knowledge are true and all statements made of information and belief are believed to be true.

Dated this 2nd day of July, 2018.

By:

Betsy Rosenblatt Legal Chair Organization for Transformative Works

## UNIVERSITY OF MINNESOTA

Twin Cities Campus

Center for German and European Studies College of Liberal Arts 214 Social Sciences Buildins 267–19th Avenue South Minneapolis, MN 55455

612-626-7705 Fax: 612-626-2242 E-mail: cges@tc.umn.edu

June 28, 2018

RE: Opposition No. 91241083 to "RAPUNZEL" mark

To Whom It May Concern:

I am a folklorist, translator and scholar of fairy tales, lately retired from my professorship at the University of Minnesota. Over a career spanning more than fifty years now, I have also held teaching positions at the University of Munich, New York University, the University of Wisconsin-Milwaukee, and the University of Florida. I hold a PhD in Comparative Literature from Columbia University. I am the author of more than a dozen books on folk and fairy tales and the editor of several more. Most recently, I completed for the Princeton University Press new translations of the 1812 and 1815 editions of the folk and fairy tale collections of the Brothers Grimm, which include a version of the "Rapunzel" tale.

I have devoted my career to understanding the social and political significance of fairy tales. I have argued in print that fairy tales for children are universal, ageless, therapeutic, miraculous, and beautiful. My work in this field has established that fairy tales have a meaningful social function for revelation: the worlds projected by the best of our fairy tales reveal the gaps between truth and falsehood in our immediate society.

"Rapunzel" is the name given to the central character in one of the tales collected by the Brothers Grimm in the early nineteenth century, a tale which itself has earlier roots and which has long been in the public domain. To the extent that a trademark registration of the "Rapunzel" name for toys and dolls would raise barriers to other toymakers using that name, I believe it would be very damaging to the public's interest in diverse interpretations of this ancient character through the material culture of toys and dolls. When we see the "Rapunzel" name, we think of the centuries-old tale of the maiden in the tower, not of any one corporation. There are numerous versions of this well-known character already available in the market. Granting trademark rights to just one company in the "Rapunzel" name for dolls would create a deleterious tool for restricting access to the only word by which the character is commonly known and chilling the creation and marketing of "Rapunzel" dolls by others. For these reasons, I support the opposition to this trademark application.

Sincerely, Mach Zuk

Jack Zipes

## **EXHIBIT D**



shopDisney/Toys/Dolls





#### ***** (2)

Disney Animators' Collection Rapunzel Doll -16''

<del>\$26.95</del> \$18.00

View Product Details

Qty (Limit 10)



1 🔻

## **EXHIBIT E**

#### Disney Animators' Collection ⊨ × + ← → C 🔒 https://www.shopdisney.com/disney-animators-collection-rapunzel-doll-16-1438030 * 📬 🚺 🔿 Item No. 6002040580334P - Product Details Rapunzel is brought to life as a bright-eyed young girl yearning for the day when life begins. In this updated edition the princess-to-be + Shipping & Delivery is gowned in a lavender robe with ribbon detailing, joined by her friend Pascal. + Reviews Safety A WARNING: CHOKING HAZARD - Small Parts. Not for children under 3 years. Magic in the details Please note: Purchase of this item is limited to 10 per Guest. • Rapunzel is outfitted in a lavender dress with long ruffled sleeves Satin ribbon lace detailDelicate lace trim on collar Deficient filting reference of the second seco The bare necessities Ages 3+ Plastic / polyester • 16" H Imported About the Artist: Glen Keane

For almost four decades at Walt Disney Animation, Glen Keane became renowned for bringing to life some of the studio's most beloved and endearing characters, Learning his craft from the

## **EXHIBIT F**



## **EXHIBIT G**

O https://www.target.com/p/disney-	princess-32-n	ny-size-rapunzel-doll/-/A-53	286927			☆	6 ⁶ 5	6	
		About this item							
	Details	Shipping & Returns		Q&A (2)					
Highlights Playdate Rapunzel stands 32" Tall Perfectly poseable with 11 points of articulation Long flowing hair Perfect addition to Playdate Maximus Includes: 1 Doll with removable outfit, 1 Tiara, 1 Br Recommended for Ages 3+	ush and 1 pair	of removable Shoes							
Have the best day ever with Playdate Rapunzel! Inspir articulated at the neck, shoulders, elbows, wrists, hips ocks. She's also dressed in her movie inspired purple Playdate Maximus!	s and knees, m	aking her perfectly poseable for	or any a	dventure! Use the brush to style Rapunzel's long	golden				
Hair Type: Straight									
Dimensions (Overall): 6.5 inches (L) x 10.5 inches (W	/) x 34 inches (	⊣)							
Suggested Age: 3 Years and Up									
Weight: 5.31 pounds									
Material: Plastic, polyester									
Doll Theme: Fashion and beauty									
Skin Tone: Light									
Doll eye color: Blue									
CPSC Choking Hazard Warnings: Choking_hazard_s	small_parts								
Hair Color: Blonde									
Articulation: Articulated									
Doll Gender: Girl									
TCIN: 53286927									
UPC: 039897617732									
tem Number (DPCI): 086-07-1328									

## **EXHIBIT H**



Toys & Games + Dolls & Accessories + Dolls



Â

5

Disney Rapunzel Classic Doll with Ring - Tangled -11 1/2 inch ★★★★★ 8 \$14⁹⁵ vprime



Rapunzel Classic Doll with Ring - Tangled \$17⁹⁵ vprime

#### Disney Tangled Classic Rapunzel Doll -- 12" by Disney ★★★☆☆☆ × 47 customer reviews | 8 answered questions

#### Share 🖂 🖪 😏 👩

#### \$29.95 vprime

or

#### Price: \$29.95 vprime

Get \$70 off instantly: Pay \$0.00 upon approval for the Amazon Prime Rewards Visa Card.

- Deluxe costume features glitter details in bodice and skirt

- Platic possible
   Platic polyester
   WARNING: CHOKING HAZARD Small parts. Not for children under 3 years.
- New (3) from \$29.95 **vprime**
- Report incorrect product information.

FREE Delivery by Friday if you order within 20 hrs 2 mins,

Get it Thursday if you order within 22 hrs 47 mins and choose paid shipping at checkout. Details

Only 5 left in stock - order

Sold by That Whatnot Shop and Fulfilled by Amazon. Gift-wrap available.

Qty:	1 ‡
1.5	



## **EXHIBIT I**



## **EXHIBIT J**



Barbie Doll Rapunzel Cut And Style 2008-Brand New- Package never opened! Pretty Shop with confidence eBay Money Back Guarantee Get the item you ordered or get your money back. <u>Learn more</u> Be the first to write a review. Condition: New Price: US \$40.00 Buy It Now Seller information pbou3517 (44 ) 100% Positive feedback Add to cart Best Offer: Make Offer Contact seller See other items Add to watch list Ships from United States 2 2 Shipping: \$10.00 Expedited Shipping | <u>See details</u> liem location: Owings, Maryland, United States Ships to: United States Delivery: Estimated on or before Fri. Jan. 25 to 01970 Have one to sell? Sell now Payments: PayPal CREDIT Special financing evaluation. <u>Apply Now</u> | Sectorms Returns: Seller does not accept returns | See details



## **EXHIBIT K**



## **EXHIBIT L**



## **EXHIBIT M**



### **EXHIBIT N**



## **EXHIBIT O**





## **EXHIBIT P**



## **EXHIBIT Q**



## **EXHIBIT R**



## **EXHIBIT S**



## **EXHIBIT T**



## **EXHIBIT U**



#### **EXHIBIT V**



Caucasian, Doll Gender: Girl Doll, Type: Doll, Doll Size: 11in., Recommended Age Range: 8+, Packaging: Original (Opened), Features: Vintage - See More

PicClick Insights for "Vintage Effanbee 11" Rapunzel Storybook Doll 1976" PicClick Exclusive

Popularity - 8 views, 0.1 views per day, 83 days on eBay. Good amount of views. 0 sold, 1 available. More
 \$\$\$\$\$ Price - Avg; \$9.99, Low; \$9.99, High; \$9.99. Good quality and value when compared to PicClick similar items. More

***** Seller - 2,496+ items sold. 0% negative feedback. Top-Rated Seller! Ships on time with tracking, 0 problems with past sales. More

### **EXHIBIT W**

1/16/2019			African	Princess Rapunz	el Doll MADE TO O	RDER Free Dome	əstic   Etsy			
Etsy	Search	for items or shops		Search		Sell on Etsy Re	egister Sign in	Discov	er Cart	
Jewelry Accessor		Clothing & Shoes	Home & Living	Wedding & Party	Toys & Entertainment	Art & Collectibles	Craft Supplies	Vintage	🍿 Gifts	

#### Similar items See more







LeenGreenBean

\$60.00 Free shipping

0





\$75.00 Free shipping



African American Doll -M... LeenGreenBean \$60.00 Free shipping



LeenGreenBean

\$64.00 Free shipping

LeenGreenBean ***** (441) ♥ Favorite shop

LeenGreenBean

\$36.00 Free shipping



African Princess Rapunzel Doll -MADE TO **ORDER - Free Domestic Shipping, Dreads** Natural Black Hair toy Baby shower nursery melanin Girl Gift



- Overview
- Handmade item
- Height: 12 Inches
- Materials: Caron, Simply Soft, Acrylic Yarn, Polyester Fiberfil
- Made to order
- Favorited by: 168 people
- Gift message available
- This shop accepts Etsy gift cards

#### Shipping & returns

Ships from United States This item may take some time to prepare. Contact the shop to find out when it will ship.

https://www.etsy.com/listing/220986737/african-princess-rapunzel-doll-made-to

## **EXHIBIT X**

Fairy Tale Dolls - Realms of Gold

Realms of Gold, Inc. E. Realms of Gold, Inc. The second

CLOTH DOLL & STUFFED ANIMAL HOSPITAL

BLOG FAIRY TALE DOLLS ABOUT

#### Fairy Tale Dolls

1/17/2019

## You can find <u>dolls</u> in two ways: 1) By the story that inspired them 2) Alphabetical by character name

Click on any title to find the corresponding dolls

African Folk Tales American Folk Tales Asian Fairy Tales English Fairy Tales French Fairy Tales Irish Fairy Tales Jewish Fairy Tales Norwegian Fairy Tales **Russian Fairy Tales** 

Aesop's Fables Brothers Grimm Tales Hans Christian Andersen Tales

> Novels and Ballets **Classic Archetypes**

#### **Complete Index of Dolls and Stories**

Click on any title to find the corresponding doll and information on his or her

story 1001 Nights

1/17/2010	Fairy Tate Dolls - Realms of Gold
	Native American Tales 1 2
	Nutcracker
	Ojibwa
	Old Woman Who Lived in a Shoe
	Paul Bunyan
	Pirate Princess
	Princess and the Pea
	Puss in Boots
	Queen Esther
	Queen of Hearts
	Rabbi
	Rabbits 1 2
	Rapunzel
	Rumpelstiltskin
S	ally Ann Thunder Ann Whiriwind Crockett
	Selkie: A Seal Girl
	Sheep
	Scheherazade
	Sleeping Beauty
	Snow Queen and Gerda
	Snow White and Rose Red
	Snow White and the Seven Dwarfs
	Sugar Plum Fairy
	Surivothai
	Swan Princess
	Tatterhood
	Tien and Bian
	Titania, the Fairy Queen
	Tokovo
	Tortoise and the Hare
	Town Mouse and the Country Mouse
	Turtles 1 2
	Vasalisa
	White Rabbit
	Witches 1 2 3
	Wizards
	Yoga Fairy
	Yohlitt
	Zuni
For more information on any of	our dolls and puppets, please feel free to e-mail us at Realms of Gold. C
call us at (650) 996-2280.	our dons and pupples, preuse reer needs to e man as at reasons of const e
	346.
CLOTH DOLL & STUFFED ANIM	AL HOSPITAL
BLOG	
FAIRY TALE DOLLS	
ABOUT	

## **EXHIBIT Y**

German Fairy Tales of the Brothers Grimm - Realms of Gold

1/17/2019

erman Fairy rates of the Brothers Grimm - Realms of Gold

Realms of Gold, Inc. Stuffed Antmal Repair and Pairy Tale Dolls Realms of Gold, Inc. Stuffed Animal Repair and Pairy Tale Dolls CLOTH DOLL & STUFFED ANIMAL HOSPITAL

BLOG FAIRY TALE DOLLS ABOUT

## German Fairy Tales of the Brothers Grimm

#### Dolls from the German Fairy Tales of the Brothers Grimm

Most of us grew up with the Grimm fairy tales, either in books, on television, or in the <u>movies</u>. These dolls are all based on the classic tales collected by two brothers in the early 19th century. They were not alone. Asbjornsen and Moe were doing the same thing in Norway, and Afanas'ev did the same thing in Russia. The tales the Grimms collected were not limited to German stories, and some trace back to Charles Perrault in 17th century France. All of our dolls are characters out of stories, immigrants from the books that Keats called "Realms of Gold." I hope that you enjoy both the dolls, and their stories, and perhaps decide to take a few home with you.

Most of our dolls are reversible. If you see two or more characters in a photo, that means there are two or more characters in one doll.



To learn more about any doll or story, simply click on the doll's name.

CLOTH DOLL & STUFFED ANIMAL HOSPITAL

https://realmsofgold.com/fairy-tale-dolls/german-fairy-tales-of-the-brothers-grimm/

## EXHIBIT Z

1. Excerpts from *The Barbie Thang*, available online at https://www.berkeleyparentsnetwork.org/advice/playing/barbiethang

#### Excerpt 1- My 4-year-old really wants a Barbie

#### Nov 2002

My 4 y.o. daughter told me the other day that she really wanted a Barbie Rapunzel. She happened to see it in Target and advertised in the paper. Up until now, we have been a Barbie-free household because quite frankly, Barbies drive me crazy (the whole thing about it being a false ideal of a woman, the high heels, etc.). And I would prefer to remain that way. But my daughter is now getting into the "pretty" thing. This includes other "princesses", all Disney of course. And this is WITHOUT us owning a single video and without her having seen most of those types of movies ever. She must pick it up from preschool or something.

ANYWAY, I know some of this is developmental. But I'd really love to get some thoughtful insights and advice from people who have gone through this with their daughters and how they came to decide Barbie or no Barbies. Dont' just tell me to "chill" because that will not be helpful to me. In the end, I just may end up "chillin", but right now, I'm looking for some good guidance so I can make up my own mind! Thanks a lot. Hilary

#### Excerpt 2

Our daughter, almost 4, wanted a Barbie car (VW). Of course, that made her want the "girls" who go in the car. We got her the camping Barbie set, with tent, 3 dolls, and camping clothes. There are no high heels, and she loves putting them to sleep in the sleeping bags. With what they are wearing, I would expect them to get some mosquito bites. Now, she also wants a Rapunzel. I decided not to worry about it. My dad wouldn't allow me to have Barbies, because of the whole body image thing, when I was young. When my older cousin finally gave me hers, I was too old to play with them any more. I still resent it, as I felt very left out playing with the other kids, and being the only one without a Barbie to bring along. When they get a little older, we can indoctrinate them about how false the commercial images are, etc. Good luck. Barbie Tolerant Mom

#### Excerpt 3

Our daughter is only 7 mo. old, but we have already had to come up with a humorous approach to "The Barbie Thang". When my daughter was born, my mother-in-law bought her a Princess Bride Barbie - complete with a magic mirror so Barbie can gaze at Prince Ken as she waits for him to rescue her. I was horrified such an ultra-passive display of feminity ... but my husband came to the rescue. He bought a Barbie-style doll named "Jade" - an African-American doll with very short hair - and dressed her up in some old GI Joe clothes. So now we have "GI Jade"!

Of course, you may not think that an Army Barbie is appropriate either, but the point is that my husband has decided for every pretty and passive Barbie figure she receives/demands, he will also find her a strong professional Barbie, preferably non- white. Barbie has dabbled in a surprising number of professions, including astronaut, pediatrician, race car driver, art teacher, basketball player, and olympic gymnast. We will give her Rapunzel if she wants it, but at the same time she'll be getting "Spanish Teacher Barbie" - Latina model. Who she plays with is totally up to her. -PJ

2. <a href="http://www.raisingmyboys.net/2013/10/">http://www.raisingmyboys.net/2013/10/</a>

1/18/2019

Raising My Boys: October 2013



Aren't these guys adorable? In addition to figurines, there are other princess and heroes themed toys in the line. Two in every three of these Kinder Surprise contain one of these special edition toys, so you've got great odds! I'm hoping to find a Rapunzel for me :) Off to eat some chocolate...



Disclosure: I'm part of the KINDER® Mom program, and I receive special perks as part of my affiliation with this group. The opinions on this blog, as always, remain my own

You might also like:



DreamWorks Pictures' Delivery Man Opens November 22 (Giveaway)