

BULKY EXHIBITS

Proceeding No.	91273672
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Filing Date	02/04/2025
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1 Flash drive

91273672

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

_____)	
TITLE LOCK CORPORATION,)	
)	
Opposer,)	
)	Opposition Nos. 91273672, 91273673
v.)	and 91273674 (consolidated)
)	
DOMIDOCS, INC.,)	Serial Nos. 90/484,750, 90/456,625 and
)	90/080,203
Applicant.)	
_____)	

**SECOND DECLARATION OF JIMMY CLARK IN SUPPORT OF OPPOSER
TITLE LOCK CORPORATION'S MOTION FOR SUMMARY JUDGMENT**

I, Jimmy Clark, hereby declare as follows:

1. I have worked for Opposer Title Lock Corporation (“Opposer”) since 2015. From 2015 until 2023, I held the position of Chief Marketing Officer. Since 2023, I have held the position of Vice President of Marketing. I declare that the following statements are true to the best of my knowledge, information, and belief and that if called upon to testify, I could and would competently testify thereto.

2. Opposer has offered fraud protection services for homeowners to detect improper filings or recordings under the marks HOME TITLE LOCK and TITLE LOCK since 2015.

3. Attached as **Exhibit C** (HTL_000001) is a true and accurate copy of a newspaper advertisement Opposer ran in 2016, which shows Opposer’s use of the marks HOME TITLE LOCK and TITLE LOCK to refer to Opposer’s provision of fraud protection services for homeowners to detect improper filings or recordings.



02/04/2025

4. Attached as **Exhibit D** (HTL_000002–12) and submitted on a flash drive¹ is a true and accurate sampling of television and radio advertisements Opposer ran in 2017, which show Opposer’s use of the marks HOME TITLE LOCK and TITLE LOCK to refer to Opposer’s provision of fraud protection services for homeowners to detect improper filings or recordings.

5. Attached as **Exhibit E** (HTL_000013) is a true and accurate copy of a newspaper advertisement Opposer ran in 2018, which shows Opposer’s use of the marks HOME TITLE LOCK and TITLE LOCK to refer to Opposer’s provision of fraud protection services for homeowners to detect improper filings or recordings.

6. Attached as **Exhibit F** (HTL_000014–22) and submitted on a flash drive is a true and accurate sampling of television and radio advertisements Opposer ran in 2018, which show Opposer’s use of the marks HOME TITLE LOCK and TITLE LOCK to refer to Opposer’s provision of fraud protection services for homeowners to detect improper filings or recording.

7. Attached as **Exhibit G** (HTL_000023–31) and submitted on a flash drive is a true and accurate sampling of television and radio advertisements Opposer ran in 2019, which show Opposer’s use of the marks HOME TITLE LOCK and TITLE LOCK to refer to Opposer’s provision of fraud protection services for homeowners to detect improper filings or recording.

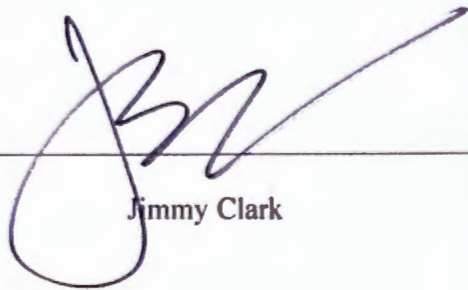
8. Attached as **Exhibit H** (HTL_000032–42) and submitted on a flash drive is a true and accurate sampling of television and radio advertisements Opposer ran in 2020, which show Opposer’s use of the marks HOME TITLE LOCK and TITLE LOCK to refer to Opposer’s provision of fraud protection services for homeowners to detect improper filings or recording.

¹ The flash drive, which includes Exhibit D and Exhibits F–I, will be mailed to United States Patent and Trademark Office, Trademark Trial and Appeal Board, P.O. Box 1451, Alexandria, VA 22313-1451.

9. Attached as **Exhibit I** (HTL_000043-50) and submitted on a flash drive is a true and accurate sampling of television and radio advertisements Opposer ran in 2021, which show Opposer's use of the marks HOME TITLE LOCK and TITLE LOCK to refer to Opposer's provision of fraud protection services for homeowners to detect improper filings or recording.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

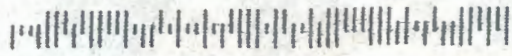
Executed on January 29, 2025



Jimmy Clark

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