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

Proceeding no.	91281389
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD**

HANGZHOU MENGKU TECHNOLOGY
CO., LTD.

Opposer,

v.

SHANGHAI ZHENGLANG TECHNOLOGY
CO., LTD.,

Applicant.

Opposition No. 91281389 (Parent)

Opposition No. 91281390

Application Ser. Nos. 90866064, 90868193

OPPOSER'S TRIAL BRIEF

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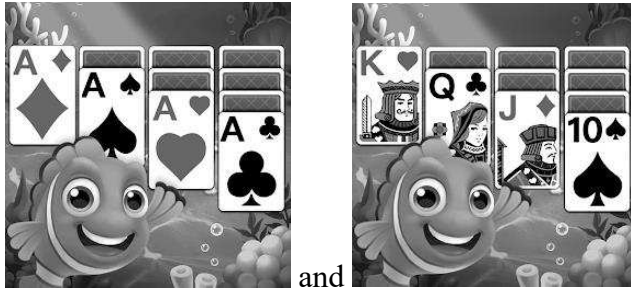
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I. INTRODUCTION

Applicant Shanghai Zhenglang Technology Co., Ltd. (“Applicant”) has applied to register



the marks and (the “Opposed Marks”), Application

Serial Nos. 90866064 and 90868193 (the “Applications”) for “Computer game programmes downloadable via the Internet; Computer game software downloadable from a global computer network; Downloadable computer application software for mobile phones, namely, software for use in database management, use in electronic storage of data, for playing online games; Downloadable computer game programmes; Downloadable computer game programs; Downloadable computer game software; Downloadable computer game software for personal computers and home video game consoles; Downloadable computer game software for use on mobile and cellular phones; Downloadable electronic game programs; Downloadable electronic game software; Downloadable electronic game software for handheld electronic devices; Downloadable electronic game software for use on mobile and cellular phones, handheld computers; Downloadable game software; Recorded computer game programs” in International Class 009 (“Applicant’s Goods”).

For the reasons and evidence discussed in this brief, the Opposed Marks are descriptive of Applicant’s Goods because each of them immediately conveys to prospective game purchasers knowledge of the ingredient, quality, characteristic, function, feature, purpose and use of solitaire games, a subcategory of Applicant’s Goods.

II. DESCRIPTION OF THE RECORD

Form of Evidence	Description of Evidence
Specimen submitted with the Applications.	Documents related to the Applications.
Opposer's Notice of Reliance	Applicant's Objections and Responses to Opposer's First Set of Requests for Production of Documents and Things (Ex. 3)
Opposer's Notice of Reliance	Applicant's Objections and Responses to Opposer's First Set of Interrogatories (Ex. 4)
Testimony Declaration of Qianan Li	Testimony of Opposer's witness Mr. Qianan Li and corresponding exhibits concerning ingredient, quality, characteristic, function, feature, purpose and use of solitaire games in general and descriptiveness of the Opposed Marks
Testimony Declaration of Ruihua Ji	Testimony of Applicant's witness Mr. Ruihua Ji and corresponding exhibits concerning alleged use of the Opposed Marks in connection with Applicant's mobile game, alleged success of its game, and other allegations
Rebuttal Testimony Declaration of Qianan Li	Rebuttal Testimony of Opposer's witness Mr. Qianan Li and exhibits

III. STATEMENT OF THE ISSUES

Whether the Opposed Marks are merely descriptive when used on or in connection with Applicant's Goods.

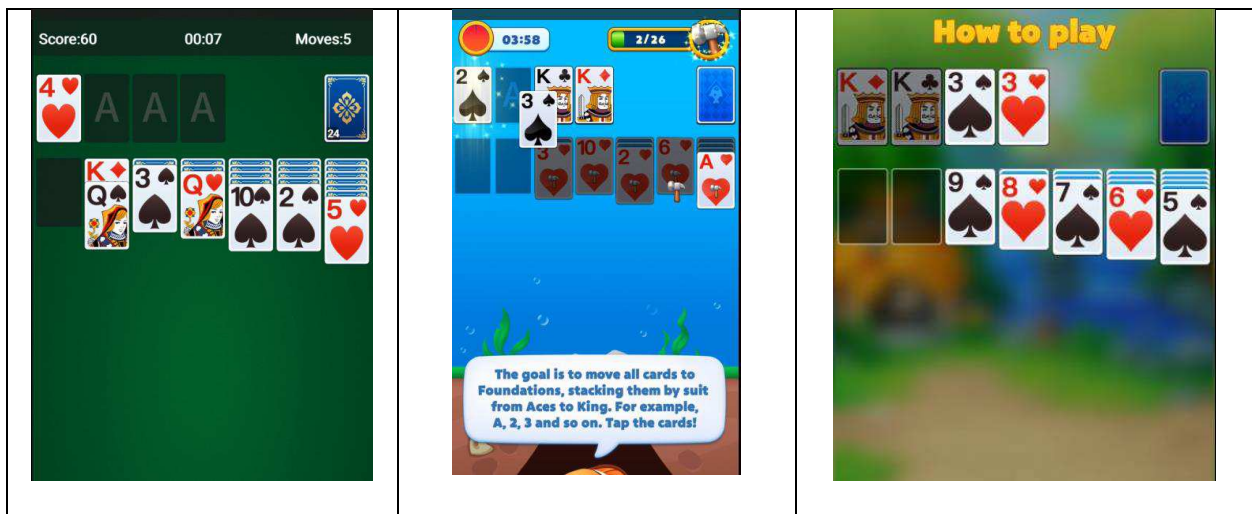
IV. FACTUAL RECORD

Google Play is a popular platform for consumers to find and download all types of mobile games for playing. Testimony Declaration of Qianan Li ("Li Decl."), ¶ 3, 19 TTABVUE *3. To help users to search for and discover the most relevant game apps in Google Play, Google Play provides a mechanism where owners of game apps can categorize and tag their games with the most appropriate features. Li Decl., ¶ 7, 19 TTABVUE *3. Specifically, Google Play provides "solitaire" as a tag and defines it as "[a]lso known as patience, a card game typically

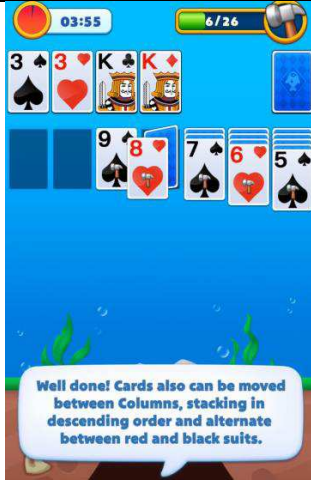
played by a single player, where the player typically has the goal of sorting the cards in some fashion.” Li Decl., ¶ 8, 19 TTABVUE *4.

Solitaire game is a widely known card game in the U.S. Li Decl., ¶ 13, 19 TTABVUE *11. The best known and most popular version of solitaire is Klondike and the term “solitaire” typically refers to Klondike. *Id.* Because the user interface of electronic solitaire games has often been designed to show several decks of cards arranged in a row on a screen, such an arrangement of decks of cards has become an important feature of electronic solitaire games. *Id.*

Indeed, the ingredients, quality, characteristic, function, feature, purpose, or use of solitaire games can be more clearly demonstrated by actual game videos and screenshots offered as evidence by Opposer. Opposer’s witness Mr. Qianan Li personally downloaded and installed seventeen (17) mobile games, played each game on an Android phone, and recorded the whole process, including the download, installation, and play of the games, by using the screen recording function available on the Android phone and made seventeen (17) MP4 videos – one for each mobile game. Li Decl., ¶¶ 4-6, 19 TTABVUE *3. Thus, the videos accurately reflect the content and features of the mobile games. *Id.* Figure 1 (below) lists representative screenshots of the games:



Ex. 4 to Li Decl. at 0:01:22,
19 TTABVUE



Ex. 7 to Li Decl. at 0:02:23,
19 TTABVUE



Ex. 13 to Li Decl. at
0:01:44, 19 TTABVUE

Ex. 5 to Li Decl. at 0:03:28,
19 TTABVUE



Ex. 8 to Li Decl. at 0:02:24,
19 TTABVUE



Ex. 14 to Li Decl. at
0:02:37, 19 TTABVUE

Ex. 6 to Li Decl. at 0:03:39, 19
TTABVUE



Ex. 11 to Li Decl. at 0:02:18, 19
TTABVUE



Ex. 15 to Li Decl. at 0:03:34, 19
TTABVUE

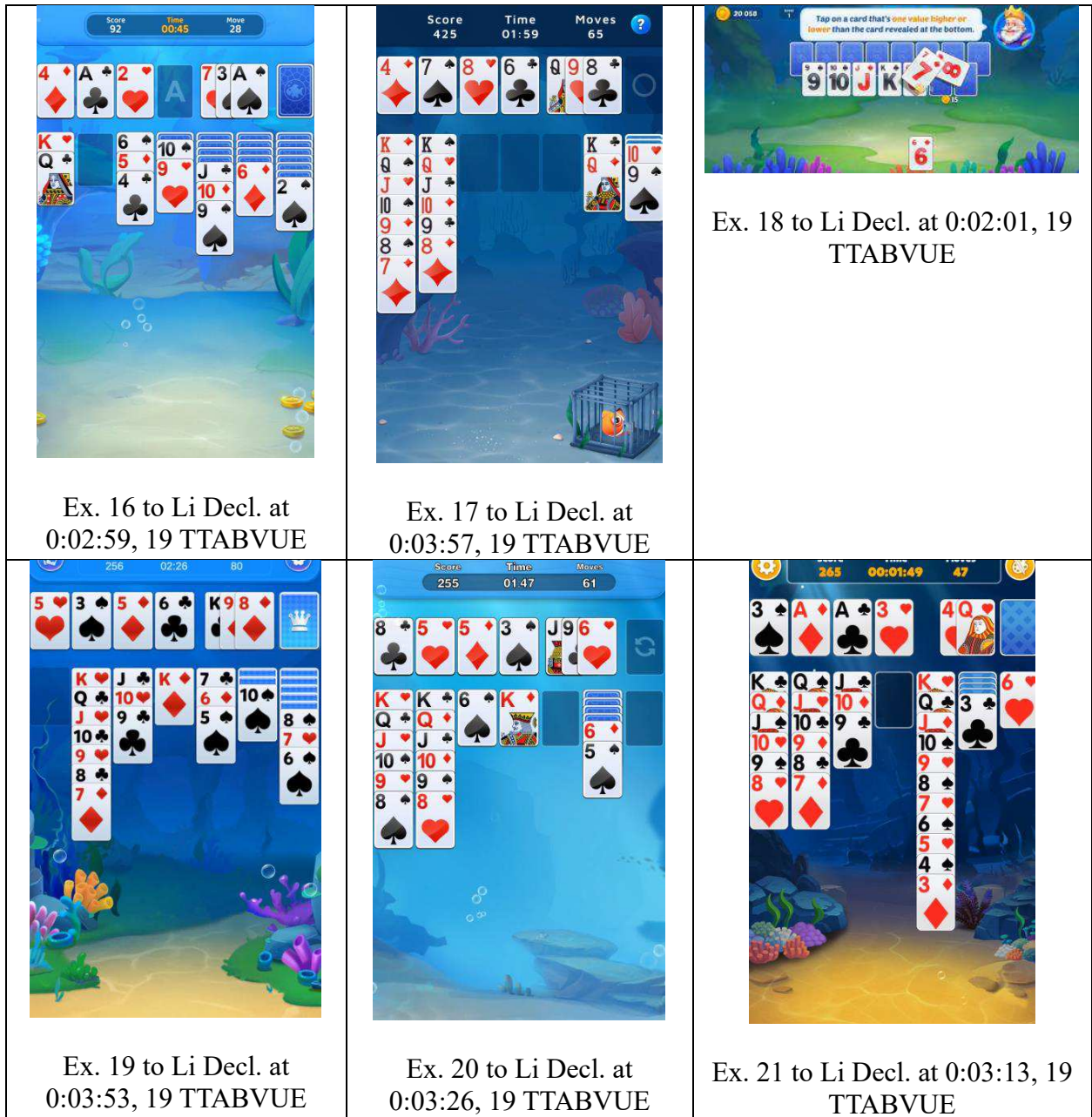


FIG. 1

As can be seen from the videos of playing these games, the common features or characteristics of solitaire games include a user interface of arranging several decks of cards in a row on a screen. The purpose of the game is to sort the cards in some fashion, typically in continuous descending order (e.g., K, Q, J, 10, 9, 8, etc.). This is consistent with Google Play’s definition of “solitaire” as a category of mobile games. In fact, the names or titles of these

games all include the word “solitaire”, and all games describe themselves as solitaire card games or Klondike. Li Decl., ¶ 14, 19 TTABVUE *12. For example, Applicant’s Solitaire Ocean game describes itself as “FUN card games of Solitaire - Klondike!” *Id.*, ¶ 10, 19 TTABVUE *5.

In addition, many of these games also feature an underwater background with depictions of seaweed and/or other underwater plants as well as one or more colorful fish such as clownfish. Li Decl., ¶ 15, 19 TTABVUE *12. For example, Figure 2 below are screenshots of the various clownfish or similar fish used in these games.

		
<p>Ex. 7 to Li Decl. at 0:02:02, 19 TTABVUE</p>	<p>Ex. 11 to Li Decl. at 0:01:50, 19 TTABVUE</p>	<p>Ex. 12 to Li Decl. at 0:02:21, 19 TTABVUE</p>

		
<p>Ex. 13 to Li Decl. at 0:01:20, 19 TTABVUE</p>	<p>Ex. 14 to Li Decl. at 0:01:32, 19 TTABVUE</p>	<p>Ex. 15 to Li Decl. at 0:01:34, 19 TTABVUE</p>
		
<p>Ex. 16 to Li Decl. at 0:02:03, 19 TTABVUE</p>		

FIG. 2

Thus, not only is electronic solitaire game a type of mobile/electronic game, but also solitaire game featuring aquatic theme is a type of mobile/electronic game. Li Decl., ¶ 17, 19 TTABVUE *14. And clownfish and underwater background are common designs widely used in aquatic-themed solitaire games. *Id.*

The specimen submitted by Applicant shows that the Opposed Marks have been allegedly used in connection with Applicant's mobile game titled "Solitaire Ocean" (hereinafter, "Applicant's Game") on the Google Play App Store ("Google Play"). Opposer's NOR, 20 TTABVUE *40-41, 88-89. Opposer have created a video for Applicant's Game. See Li Decl., Ex. 7, 19 TTABVUE. As shown in the video, Applicant's Game features aquatic-themed solitaires. Indeed, the title of this game describes itself as "Solitaire Ocean".

V. OPPOSER ARE ENTITLED TO BRING THIS OPPOSITION

Opposer is a competitor to Applicant. Li Decl., ¶¶ 2-3, 19 TTABVUE *2-3. In addition, Opposer has published a mobile game featuring solitaire and titled "Solitaire Puzzlejoy" on Google Play at <https://play.google.com/store/apps/details?id=com.puzzlejoy.puzzle.solitaire>. Li Decl., ¶ 2, Ex. 1, 19 TTABVUE *2-3. Thus, Opposer has standing in opposing the Opposed Marks on the ground of descriptiveness. See, e.g., *Performance Open Wheel Racing, Inc. v. United States Auto Club Inc.*, 2019 USPQ2d 208901, at *2 (TTAB 2019) (standing established because parties are competitors in arranging automobile racing events); *Kohler Co. v. Honda Giken Kogyo K.K.*, 125 USPQ2d 1468, 1487 (TTAB 2017) (opposer's status as competitor establishes standing to oppose registration of product configuration); *Eastman Kodak Co. v. Bell & Howell Document Management Products Co.*, 23 USPQ2d 1878, 1879 (TTAB 1992), aff'd 994 F.2d 1569, 26 USPQ2d 1912 (Fed. Cir. 1993) (party challenging mark on descriptiveness grounds may establish standing by pleading and proving it is engaged in manufacture or sale of related products); 3 J. Thomas McCarthy, *McCarthy on Trademarks and Unfair Competition* § 20:11(4th ed. WESTLAW update 2011) (competitor presumptively has standing).

VI. THE OPPOSED MARKS ARE DESCRIPTIVE

A. Legal Standard





Section 2(e)(1) of the Lanham Act provides that registration of a trademark shall be refused if it is “merely descriptive” when “used on or in connection with the goods of the applicant.” 15 U.S.C. § 1052(e). A mark is merely descriptive if it immediately conveys to prospective purchasers knowledge of an ingredient, quality, characteristic, function, feature, purpose, or use of the specified goods or services. *See In re N.C. Lottery*, 866 F.3d 1363, 1367, 123 USPQ2d 1707, 1709 (Fed. Cir. 2017); *In re TriVita, Inc.*, 783 F.3d 872, 114 USPQ2d 1574 (Fed. Cir. 2015). Where a mark is merely descriptive of any item in a particular class, registration is refused for the entire class. *See In re Chamber of Commerce of U.S.*, 675 F.3d 1297, 102 USPQ2d 1217, 1219 (Fed. Cir. 2012).

A design which consists merely of an illustration of one’s product is unregistrable under Section 2(e)(1), just as merely descriptive wording would be. *In re Swatch Grp. Mgmt. Servs. AG*, 110 USPQ2d 1751, 1755 (TTAB 2014); *see also, In re Singer Mfg. Co.*, 255 F.2d 939, 118 USPQ 310, 311-12 (CCPA 1958) (“It is, of course, true that a design consisting merely or essentially of a pictorial representation of the goods on which it is used is descriptive, and is not a valid trademark”) (citation omitted); *In re Soc’y for Private and Commercial Earth Stations*, 226 USPQ 436 (TTAB 1985) (pictorial representation of a satellite dish held merely descriptive of an association promoting the interests of members of the earth station industry); *In re Underwater Connections, Inc.*, 221 USPQ 95, 95 (TTAB 1983) (pictorial representation of a compressed air gas tank held merely descriptive of travel-tour services involving underwater diving); *In re Eight Ball, Inc.*, 217 USPQ 1183, 1184 (TTAB 1983) (pictorial representation of a cue stick and eight ball found merely descriptive of billiard parlor services). To be considered merely descriptive, the illustration or representation need not be completely accurate, realistic or true-to-life. *In re Swatch Grp. Mgmt. Servs. AG*, 110 USPQ2d 1751, 1755 (TTAB 2014). A

mark need not describe all of the characteristics, attributes or functions of a product to be considered merely descriptive; it need only describe “one significant function or attribute or property.” *In re Bright-Crest, Ltd.*, 204 USPQ 591, 593 (TTAB 1979).

B. Each Of The Opposed Marks Is Merely A Pictorial Representation Of Solitaire Games.

Each of the Opposed Marks consists merely of an illustration of Applicant’s Game and of solitaire games more broadly. *In re Swatch Grp. Mgmt. Servs. AG*, 110 USPQ2d 1751, 1755 (TTAB 2014) (“A design which consists merely of an illustration of one’s product is unregistrable under Section 2(e)(1), just as merely descriptive wording would be.”) Specifically, each of the Opposed Mark consists of several decks of cards arranged in a row with underwater background. This is the very feature and characteristics of Applicant’s Game and of aquatic-themed solitaire games more broadly. The clown fish in the Opposed Marks is the same as the one in Applicant’s Game, and it is very similar to clown fish depicted in some third-party games. See Figure 3 below.

Opposed Marks	Applicant’s Game	Third-party Games
	 <p data-bbox="527 1486 829 1556">Ex. 7 to Li Decl. at 0:02:03, 19 TTABVUE</p>	 <p data-bbox="911 1514 1321 1583">Ex. 15 to Li Decl. at 0:01:29, 19 TTABVUE</p> 

		Ex. 16 to Li Decl. at 0:02:03, 19 TTABVUE
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FIG. 3

C. Each Of The Opposed Marks Is Merely Descriptive Because It Immediately Conveys To Prospective Game Purchasers Knowledge Of The Ingredient, Quality, Characteristic, Function, Feature, Purpose, And Use Of Solitaire Games.

Descriptiveness of an image is not considered in the abstract but is considered in relation to the particular goods or services for which registration is sought, the context in which it is being used, and the possible significance that the image would have to the average purchaser of the goods or services because of the manner of use or intended use. *In re Bayer*, 82 USPQ2d at 1831 (citing *In re Abcor* 200 USPQ at 216); see also, *In re Chamber of Commerce*, 102 USPQ2d at 1219. The question is not whether someone presented with only the mark could guess what the goods or services are. Rather, the question is whether someone who knows what the goods and services are will understand the mark to convey information about them. *In re Tower Tech Inc.*, 64 USPQ2d 1314, 1316-17 (TTAB 2002).

Here, there is no question that prospective purchasers who know the goods are solitaire games will understand that each of the Opposed Mark conveys knowledge of an ingredient, quality, characteristic, function, feature, purpose, or use of solitaire games. When compared with the screenshots of mobile games featuring solitaires illustrated above in Figure 1, it is obvious that the Opposed Marks contain the same ingredients and features of a typical solitaire game.

In addition, the context in which the Opposed Marks are being used and the manner of use also support the finding that the Opposed Marks are merely descriptive of solitaire games. The Applications' specimens show the description page of Applicant's Game on Google Play, where the Opposed Marks were used as the app icons. 20 TTABVUE *40-41, 88-89. Figure 4

(below) is a reproduction of page 1 of one of the specimens. As shown, one of the Opposed Marks was placed side-by-side with the game's title "Solitaire Ocean" as well as a descriptive screenshot of the game. 20 TTABVUE *40.

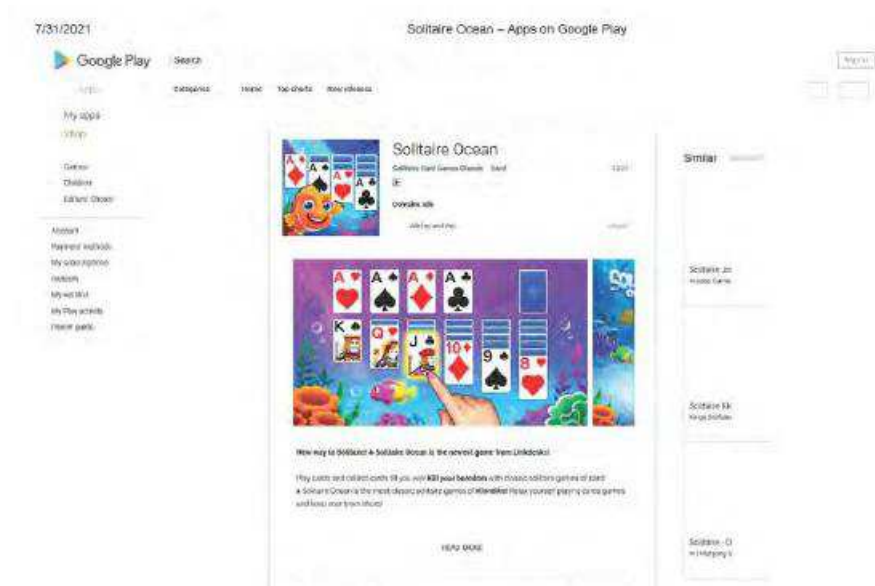


FIG. 4

D. The Opposed Marks Are Not Distinctive.

1. The Opposed Marks contain no distinctive matter.

The Opposed Marks have no distinctive element. The cards and the underwater background immediately convey to prospective game purchasers knowledge of the ingredient, quality, characteristic, function, feature, purpose and use of aquatic-themed solitaire games. Nor is the clown fish in the Opposed Marks distinctive because it is a common design easily found in many other third-party aquatic-themed solitaire games. Li Decl., ¶ 17, 19 TTABVUE *14.

For example, the Opposed Marks are similar or almost identical to several third-party games featuring solitaires. Figure 5 (below) is a side-by-side comparison between the Opposed Marks and some exemplary icons used by third-party games. *See also* Figure 3.

Opposed Marks



Exemplary App Icons of Third-Party Games



Solitaire: Fishing Go!

MEZZEN Limited

Contains ads · In-app purchases

4.8★

13.8K reviews

500K+

Downloads

E

Everyone

Li Decl., Ex. 22-D, 19 TTABVUE *73



Solitaire 3D Fish

Polar Bear Studio

Contains ads · In-app purchases

4.6★

446K reviews

5M+

Downloads

E

Everyone

Li Decl., Ex. 22-E, 19 TTABVUE *78



Solitaire - Card Game

Dream Fish Games

Contains ads · In-app purchases

4.7★

1.85K reviews

50K+

Downloads

E

Everyone

Li Decl., Ex. 22-G, 19 TTABVUE *90



Solitaire - Fishland

LazyDog Game

Contains ads · In-app purchases

4.8★

8.02K reviews

500K+

Downloads

E

Everyone

Li Decl., Ex. 22-H, 19 TTABVUE *95



Solitaire Fish: Card Games

MEZZEN Limited

Contains ads · In-app purchases

4.7★

1.19K reviews

10K+

Downloads

T

Teen

<u>Opposed Marks</u>	<u>Exemplary App Icons of Third-Party Games</u>
	<p data-bbox="643 247 1154 281">Li Decl., Ex. 22-K, 19 TTABVUE *112</p>  <p data-bbox="643 674 1154 707">Li Decl., Ex. 22-L, 19 TTABVUE *117</p>

FIG. 5

2. The alleged number of downloads for Applicant’s Game cannot be attributed to the Opposed Marks.

Google Play requires a developer to provide an app icon to publish an app on Google Play. Rebuttal Testimony Declaration of Qianan Li (“Li Rebuttal Decl.”), ¶ 3, 26 TTABVUE *3. However, Google Play also allows a developer to use different app icons for the same app under different language settings. *Id.* This is called app localization. *Id.* Depending on the language setting of a user on his or her device, Google Play displays the specific app icon configured for the user’s language setting for the app on the user’s device. *Id.*

An easy way to figure out an app’s localization configuration is to manipulate the app’s URL by adding the language parameter “hl=xxxx”, where “xxxx” is replaced by a specific language abbreviation. Li Rebuttal Decl., ¶ 4, 26 TTABVUE *3. If the language parameter is not specified in the URL, the default language setting of the Google Account is used (if no account login, the language of the device or browser may be used). *Id.*




For example, the specimen submitted by Applicant in its Application Ser. No. 90866064 is a Google Play webpage printout of Applicant’s Game. The URL of the webpage is

<https://play.google.com/store/apps/details?id=linkdesks.classicsolitaire.klondike.cardgames&hl=en-sg>. 20 TTABVUE *40-41. Here, the “hl=en-sg” parameter of the URL indicates that the language setting is English Singapore – a language setting mostly used by consumers in Singapore. Li Rebuttal Decl., ¶ 5, 26 TTABVUE *3.

Similarly, the specimen submitted by Applicant in its Application Ser. No. 90868193 is a Google Play webpage printout of Applicant’s Game. The URL of the webpage is <https://play.google.com/store/apps/details?id=linkdesks.classicsolitaire.klondike.cardgames&hl=en-za>. 20 TTABVUE *88-89. Here, the “hl=en-za” parameter of the URL indicates that the language setting is English South Africa – a language setting mostly used by consumers in South Africa. Li Rebuttal Decl., ¶ 6, 26 TTABVUE *3-4.

Applicant relied on the download numbers of Applicant’s Game as evidence that the Opposed Marks are distinctive to attract many users. Testimony Declaration of Ruihua Ji (“Ji Decl.”), ¶ 25, 22 TTABVUE *20. However, the download number relied upon by Applicant is the **global** download number of Applicant’s Game. Li Rebuttal Decl., ¶ 7, 26 TTABVUE *4. Applicant provided no evidence to show that Applicant’s Game has been using the Opposed Marks globally (i.e., for all language settings). Li Rebuttal Decl., ¶ 8, 26 TTABVUE *4-5. Furthermore, because Applicant could change its game’s icon from time to time, nor had Applicant provided any evidence to show that Applicant’s Game has been using the Opposed Marks throughout the relevant period. *Id.* On the contrary, there is evidence to show that Applicant has been using different icons for different language settings and/or different time periods for Applicant’s Game. *Id.*

The table below lists the different icons Applicant’s Game has used for different language settings and/or at different time in the past: (the game’s URL without any language setting is <https://play.google.com/store/apps/details?id=linkdesks.classicsolitaire.klondike.cardgames>)

Icon	Language Setting	Relevant Time	Supporting Evidence
		August 21, 2021	See Li Rebuttal Decl., Exhibit 4, a true and correct Internet Archive Wayback Machine webpage printout. As shown, the URL of the captured webpage is https://play.google.com/store/apps/details?id=linkdesks.classicsolitaire.klondike.cardgames , and the captured date is August 21, 2021.
	hl=en-in	June 21, 2021	See Li Rebuttal Decl., Exhibit 5, a true and correct webpage printout. As shown, the URL of the webpage is https://play.google.com/store/apps/details?id=linkdesks.classicsolitaire.klondike.cardgames&hl=en-in , and the captured date is June 21, 2021.
	hl=en	July 25, 2023	See Li Rebuttal Decl., Exhibit 6, a true and correct Internet Archive Wayback Machine webpage printout. As shown, the URL of the captured webpage is https://play.google.com/store/apps/details?id=linkdesks.classicsolitaire.klondike.cardgames&hl=en , and the captured date is July 25, 2023.



For the foregoing reasons, the global download number for Applicant’s Game cannot and should not be all attributed to the Opposed Marks. Li Rebuttal Decl., ¶ 10, 26 TTABVue *5-6. As such, Mr. Ruihua Ji’s testimony that Opposed Marks were distinctive enough to attract consumers because Applicant’s Game had gained certain number downloads is groundless. *Id.* Nor does Applicant’s evidence support the conclusion that use of the Opposed Marks made Applicant’s Game successful.

3. Applicant failed to produce other admissible and reliable evidence to support its case.

Applicant relies on third-party opinions and hearsay to support its case. Particularly, Applicant relies on Exhibit 10 to the Ji Declaration, a third-party article from *International*

Journal of Human-Computer Studies, titled “An icon that everyone wants to click: How perceived aesthetic qualities predict app icon successfulness”, to support the proposition that “uniqueness was a strong predictor of icon successfulness, defined as users’ willingness to click, download, and/or buy an app after viewing the icon.” Ji Decl., ¶ 22, 22 TTABVUE *19. For reasons stated in Opposer’s evidentiary objections, attached as Appendix to this brief, this article is not admissible evidence. Even if the Board decides to consider the evidence, this article should be given low probative value and weight because the article does not make or support the conclusion that if an app has obtained a high number of downloads, it must be because the app’s icon is unique or distinctive. Li Rebuttal Decl., ¶ 12, 26 TTABVUE *6.

VII. CONCLUSION

Applicant’s registration applications for the marks  and  should be rejected and Opposer’s opposition should be granted because the Opposed Marks are merely descriptive when used on or in connection with mobile games.

Dated: September 27, 2024

Respectfully submitted,

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Appendix – Evidentiary Objections

On June 13, 2024, Applicant submitted Ruihua Ji’s Testimony Declaration (“Ji Declaration”) and its exhibits 1-55. 22-24 TTABVue. But the Ji Declaration and its exhibits contain inadmissible evidence and testimony. Below are the grounds and reasons for Opposer’s objections to these inadmissible evidence and testimony.

Objected Evidence and Testimony	Grounds and Reasons for the Objections
<ul style="list-style-type: none"> • Exhibits 3, 4, 10, and 11 to Ji Declaration; and • Paragraphs 15, 22, 26, and 27 of Ji Declaration; 	<p>Hearsay; lack of foundation; inadmissible expert opinion.</p> <p>Exhibits 3, 4, 10, and 11 are hearsay. They are offered to show the truth of the matter asserted therein.</p> <p>Furthermore, exhibits 4 and 10 constitute subjective opinions of a person. They are not objective in nature. Applicant has not disclosed any expert witness.</p>
<ul style="list-style-type: none"> • Exhibits 12-55 to Ji Declaration; and • Paragraphs 28-34 of Ji Declaration; 	<p>Irrelevancy.</p> <p>The Board and the Federal Circuit had held that third-party registrations were irrelevant to the registrability of an opposed mark. <i>See In re Mayweather Promotions, LLC</i>, 86753084 (T.T.A.B. Oct. 29, 2020) (“third-party registrations are irrelevant” and “prior decisions and actions of other trademark examining attorneys in registering other marks have little evidentiary value and are not binding upon the USPTO or the [Board]”); <i>see also, In re Nett Designs Inc.</i>, 236 F.3d 1339, 57 USPQ2d 1564, 1566 (Fed. Cir. 2001) (noting we “must assess each mark on the record of public perception submitted with the application” and finding “little persuasive value” in third-party registration evidence of alleged inconsistency); <i>In re Merrill Lynch, Pierce, Fenner & Smith Inc.</i>, 828 F.2d 1567, 4 USPQ2d 1141, 1142 (Fed. Cir. 1987) (“Each</p>

	application for registration must be considered on its own merits”).
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Dated: September 27, 2024

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

HANGZHOU MENGKU TECHNOLOGY
CO., LTD.
Opposer,

v.

SHANGHAI ZHENGLANG TECHNOLOGY
CO., LTD.,
Applicant.

Opposition No. 91281389 (Parent)
Opposition No. 91281390

Application Ser. Nos. 90866064, 90868193

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of Opposer's Trial Brief and Appendix thereto was served by e-mail on September 27, 2024 to counsel of record for Applicant.

Date: September 27, 2024

/s/ Jigang Jin
Jigang Jin