

ESTTA Tracking number: **ESTTA1079685**

Filing date: **09/03/2020**

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

Proceeding	92074009
Party	Defendant Franklin Square Holdings, L.P.
Correspondence Address	CAMILLE MILLER COZEN O'CONNOR 1650 MARKET STREET PHILADELPHIA, PA 19103 UNITED STATES Primary Email: cmiller@cozen.com Secondary Email(s): mmiller@cozen.com k, gibbs@cozen.com 215-665-2273
Submission	Motion to Consolidate
Filer's Name	Camille M. Miller
Filer's email	cmiller@cozen.com, jdostal@cozen.com, kgibbs@cozen.com, mmiller@cozen.com, treginelli@cozen.com, cbranka@cozen.com, phipdocketing@cozen.com
Signature	/Camille M. Miller/
Date	09/03/2020
Attachments	Franklin Square - Growmark Motion to Consolidate.PDF(386401 bytes)

**FRANKLIN SQUARE HOLDINGS L.P.’S MOTION WITH CONSENT OF
GROWMARK, INC. TO CONSOLIDATE**

Respondent, Franklin Square Holdings, L.P. (“Franklin Square”) hereby moves, pursuant to Rule 511 of the Trademark Trial and Appeal Board Manual of Examining Procedure (“TBMP”), for consolidation of Petition to Cancel No. 92,074,009, Petition to Cancel No. 92,074,010, and Petition to Cancel No. 92,074,011, all of the aforementioned involving Growmark, Inc. (“Growmark”) as Petitioner and Franklin Square as Registrant on the grounds that the cases involve common questions of law and fact.

I. BACKGROUND

1. Franklin Square was issued Registration No. 4,723,056 for the mark “FS INVESTMENTS” for “investment of funds for others; management of investment of funds for others; investment management services; Business Development Company funding services to small and mid-sized businesses; Business Development Company services, namely, providing financing to small and mid-sized businesses; Business Development Company fund management; Business Development Company financing; mutual fund brokerage, distribution, investment; investment administration, distribution, and management of mutual funds; financial portfolio and investment management; investment advisory services; investment consultation; financial asset management; stock brokerage services; fund investment consultation; funds investment; asset allocation services” in International Class 36 by the United States Patent and Trademark Office (“USPTO”) on April 21, 2015. (the “FS INVESTMENTS Mark”)

2. Franklin Square was issued Registration No. 4,989,475 for the mark “FS



INVESTMENTS and Design” INVESTMENTS for “investment of funds for others; management of investment of funds for others; investment management services; Business Development Company funding services to small and mid-sized businesses; Business Development Company services, namely, providing financing to small and mid-sized businesses; Business Development Company fund management; Business Development Company financing; mutual fund brokerage, distribution, investment; investment administration, distribution, and management of mutual funds; financial portfolio and investment management; investment advisory services; investment consultation; financial asset management; stock brokerage services; fund investment consultation; funds investment; asset allocation services” in International Class 36 by the USPTO on June 28, 2016.

3. Franklin Square was issued Registration No. 5,102,059 for “FS INVESTMENT SOLUTIONS” for “investment of funds for others; management of investment of funds for others; investment management services; Business Development Company funding services to small and mid-sized businesses; Business Development Company services, namely, providing financing to small and mid-sized businesses; Business Development Company fund management; Business Development Company financing; mutual fund brokerage, distribution, investment; investment administration, distribution, and management of mutual funds; financial portfolio and investment management; investment advisory services; investment consultation; financial asset management; stock brokerage services; fund investment consultation; funds investment; asset allocation services; financial services, namely, broker/dealer services on securities exchanges and over-the-counter markets” in International Class 36 by the USPTO on

December 13, 2016.

4. Growmark was issued Registration No. 2,371,319 for “FS AGRI-FINANCE” for “financial services, namely, providing loans to farmers” in International Class 36 by the USPTO on July 25, 2000. (the “FS Mark”)

5. Growmark was issued Registration No. 5,121,266 for “FS and Design”



for “financial services, namely, banking services” in International Class 36, as well as other goods and services, by the USPTO on January 10, 2017.

6. Growmark was issued Registration No. 5,360,625 for “FS” for “financial services, namely, banking services” in International Class 36, as well as other goods and services, by the USPTO on December 19, 2017.

7. Growmark filed pending intent-to-use trademark application Serial No. 88/241,514 for “FS” for “agricultural mapping services; agricultural services, namely, providing temporary use of non-downloadable computer software applications for use with mobile phones, tablet computers, mobile telecommunication devices, and personal computers, namely, software for assisting agricultural professionals with the inspection, research, data collection and analysis, spectral sampling, and information on crop health and precision agriculture methods and technology; agricultural testing for seeds, crop protection products, and fertilizer; analyzing and evaluating agricultural fertilizer and nutrients; analyzing and evaluating nitrogen in soil; application service provider (ASP) featuring e-commerce software for use as a payment gateway that authorizes processing of credit cards or direct payments for merchants; application service provider, namely, hosting, managing, developing, and maintaining applications, software, and web sites, in the fields of wireless communication, mobile information access, and remote data

management for wireless delivery of content to handheld computers, laptops and mobile electronic devices; applied scientific research in the fields of agriculture, agronomy, farming and crop yields; cloud computing featuring software for use in farm information management; cloud computing featuring software for use in farm information management to provide statistics and graphical analysis of crop production, costs, and health; cloud computing featuring software used to provide financial analysis of a farm; cloud computing featuring software used to provide feedback from precision agriculture machinery, equipment, and devices; computer services, namely, acting as an application service provider in the field of information management to host computer application software for the purpose of ecommerce transaction processing, and information and data collection, editing, organizing, modifying, transmission, storage, and sharing; computer services, namely, providing a website featuring temporary use of non-downloadable computer software for collecting, analyzing, and providing data and information regarding electronic payment transactions; computer software design, computer programming, and maintenance of computer software; computer software development, computer programming, and maintenance of computer software for precision agriculture programs; providing temporary use of non-downloadable computer software for use in issuing and providing receipts for others for electronic payments and payment transactions; computer graphics design services, namely, creating of 3-D computer models; database design and development; electronic data storage; farm product input services, namely, agricultural testing for determining soil nutrients and composition; field scouting services, namely, observing and inspecting agriculture fields to identify problems associated with weeds, insects, and diseases; mapping and surveying services for precision farming by means of the application and utilization of technologies and agronomic principles to manage spatial and temporal variability associated

with all aspects of agricultural production using satellite imagery, GPS mapping, soil mapping, variable rate technologies, geospatial tools, and yield monitoring for improving the control and management of crops and increasing yields; providing temporary use of non-downloadable electronic financial software that accommodates multiple types of payment and debt transactions in an integrated mobile device and web based environment; providing temporary use of non-downloadable software for accessing, planning, and managing information for use in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; providing temporary use of non-downloadable software for budgeting, forecasting, and consolidation of financial data and financial reporting, and for use in financial reporting and analysis; providing temporary use of non-downloadable software for recording field and crop observations related to pest pressure, for tracking field conditions with GPS-enabled maps, and for generating crop scouting reports; providing temporary use of non-downloadable software that provides business management intelligence by combining information from various databases and presenting it in an easy-to-understand user interface; providing temporary use of non-downloadable software for agricultural, automotive, energy, and industrial uses, namely, for use in data collection, aggregation, analysis, georeferencing, management, reporting, warehousing, employment recruiting, financial analysis, event logistics, order entry, payments, product selection and use, and publication distribution; providing temporary use of non-downloadable software applications to assist with product selection in the automotive, energy, fuel, grease, lubricant, and oil sectors; platform as a service (PAAS) featuring computer software platforms for agricultural fertilizer and nutrient monitoring and management in soil; platform as a service (PAAS) featuring computer software platforms for inventorying, tracking, and verifying plant-available nitrogen in soil; platform as a service (PAAS) featuring computer software platforms for nitrogen

monitoring and management in soil; professional consulting services about agricultural chemistry and fertility plans; providing a website featuring agricultural research information in the fields of agronomy, farming, and crop yields; providing a website featuring agricultural research information in the fields of biology, ecology, organisms, biosystematics, environment, biological control, entomology, mycology, and bacteriology; providing a website featuring technology that allows users to access, plan, and manage information in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; providing an interactive web site featuring technology that enables users to enter, access, track, manage, monitor, and generate information and reports regarding sales of products and services; providing an online non-downloadable internet based system in the nature of software applications featuring technology enabling users to access, plan, and manage information for use in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; providing information for farmers in the fields of agricultural and crop research; providing scientific information in the fields of agricultural research, agronomy, farming, crop yields, environmentalism, conservationism, biological diversity, global climate change, environmental sustainability, sustainable consumption, natural resource preservation, endangered species, sustainable business practices, environmental issues, soil sampling, crop observing, genetics, plant varieties, seeds, farming practices, harvesting, chemistry, crop production, crop costs, and crop health; providing non-downloadable software applications featuring technology enabling users to access, plan, and manage information for use in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; providing technological and scientific information about agricultural fertilizer and nutrient monitoring and management; providing technological and scientific information about inventorying, tracking, and verifying plant-

available nitrogen in soil; providing technological and scientific information about nitrogen monitoring and management in soil; providing temporary use of non-downloadable computer software for use in issuing and providing receipts for others for electronic payments and payment transactions; providing temporary use of non-downloadable computer software that enables consumers and businesses to perform electronic payment transactions through the use of their electronic signature, personal identification number (PIN), name, or photo; providing temporary use of on-line non-downloadable cloud computing software for accessing, selecting, processing, downloading, and managing map-based data for use in agriculture; providing temporary use of on-line non-downloadable computer software for payment processing, user authentication, and or management and tracking of payment transactions; providing temporary use of online non-downloadable software for use in collecting, analyzing, and providing data and information regarding electronic payment transactions; providing temporary use of on-line non-downloadable suite of software tools for agricultural field optimization and precision agriculture; reporting of soil testing results directly to growers; research and development in the field of agronomy, farming, and crop yields; scientific data analysis services and custom development of computer software in the field of precision agriculture, namely, the use of sensors, maps, imagery, soil conditions, crop yield and other data to monitor and devise a plan for increasing crop yield, together with the use of equipment to carry out the devised plan; scientific research services in the fields of genetics, plant varieties, seeds, agronomy, and plant harvesting and transformation methods; providing temporary use of non-downloadable simulation software in the field of controlling agriculture and farm equipment and vehicles; technical research in the fields of soil and agronomy; providing temporary use of non-downloadable virtual reality training simulation software in the field of controlling agriculture and farm equipment and vehicles” in International

Class 42 with the USPTO on December 26, 2018.

8. Growmark filed pending intent-to-use trademark application Serial No.



88/688,731 for “FS and Design” for “downloadable computer e-commerce software to allow users to perform electronic business transactions via mobile devices and local and global computer networks; Downloadable computer software applications to assist agricultural professionals with the inspection, research, data collection and analysis, spectral sampling, and information on crop health and precision agriculture methods and technology; Downloadable computer software applications for agricultural, automotive, energy, and industrial uses, namely, for use in data collection, aggregation, analysis, georeferencing, management, reporting, warehousing, employment recruiting, financial analysis, event logistics, order entry, payments, product selection and use, and publication distribution; Downloadable computer software applications to assist with product selection in the automotive, energy, fuel, grease, lubricant, and oil sectors; Downloadable computer software for budgeting, forecasting, consolidation of financial data and financial reporting, for use in financial reporting or analysis; Downloadable computer software for creating searchable databases of information and data; Downloadable computer software for monitoring the operation of mechanized agricultural equipment during agricultural operations; Downloadable computer software for the collection, editing, organizing, modifying, transmission, storage and sharing of data and information; Downloadable computer software, namely, electronic financial software that accommodates multiple types of payment and debt transactions in an integrated mobile device and web based environment; Downloadable computer software that provides business management intelligence by combining information from various databases and presenting it in an easy-to-understand user

interface; Downloadable mobile applications for accessing, planning, and managing information for use in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; Downloadable mobile applications for recording field and crop observations related to pest pressure, tracking field conditions with GPS-enabled maps, and generating crop scouting reports; Downloadable computer software for use by customers to manage data relating to farm inputs, costs, and crop yield results; Decision support systems in the nature of computer hardware and downloadable software for use in data collection, aggregation, analysis, georeferencing, management, reporting, warehousing, employment recruiting, financial analysis, event logistics, order entry, payments, product selection and use, and publication distribution in the field of precision agriculture and variable rate technology; Decision support systems in the nature of computer hardware and software for use in data collection, aggregation, analysis, georeferencing, management, reporting, warehousing, employment recruiting, financial analysis, event logistics, order entry, payments, product selection and use, and publication distribution in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; Simulators for driving and control of vehicles and farm equipment; Downloadable software applications for use with mobile phones, tablet computers, mobile telecommunication devices, and personal computers, namely, software for assisting agricultural professionals with the inspection, research, data collection and analysis, spectral sampling, and information on crop health and precision agriculture methods and technology; Downloadable software for accessing, planning, and managing information for use in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; Downloadable mobile software for obtaining information, posting resumes, and submitting applications in the fields of employment, careers, employment opportunities, career placement, recruitment, job listings, personal issues related to

careers and work life, job resources, salary information, and compensation and benefits;
Downloadable electronic publications in the nature of journals, newsletters, and catalogs in the
fields of agriculture, agronomy, automotive, business, energy, finance, horticulture, and
industrial equipment” in International Class 9 with the USPTO on November 12, 2019.

9. Growmark filed pending intent-to-use trademark application Serial No.



88/691,069 for “FS and Design” for “agricultural mapping services; Agricultural
services, namely, providing temporary use of non-downloadable computer software applications
for use with mobile phones, tablet computers, mobile telecommunication devices, and personal
computers, namely, software for assisting agricultural professionals with the inspection, research,
data collection and analysis, spectral sampling, and information on crop health and precision
agriculture methods and technology; Agricultural testing for seeds, crop protection products, and
fertilizer; Analyzing and evaluating agricultural fertilizer and nutrients; Analyzing and
evaluating nitrogen in soil; Application service provider (ASP) featuring e-commerce software
for use as a payment gateway that authorizes processing of credit cards or direct payments for
merchants; Application service provider, namely, hosting, managing, developing, and
maintaining applications, software, and web sites, in the fields of wireless communication,
mobile information access, and remote data management for wireless delivery of content to
handheld computers, laptops and mobile electronic devices; Applied scientific research in the
fields of agriculture, agronomy, farming and crop yields; Cloud computing featuring software for
use in farm information management; Cloud computing featuring software for use in farm
information management to provide statistics and graphical analysis of crop production, costs,
and health; Cloud computing featuring software used to provide financial analysis of a farm;

Cloud computing featuring software used to provide feedback from precision agriculture machinery, equipment, and devices; Computer services, namely, acting as an application service provider in the field of information management to host computer application software for the purpose of ecommerce transaction processing, and information and data collection, editing, organizing, modifying, transmission, storage, and sharing; Computer services, namely, providing a website featuring temporary use of non-downloadable computer software for collecting, analyzing, and providing data and information regarding electronic payment transactions; Computer software design, computer programming, and maintenance of computer software; Computer software development, computer programming, and maintenance of computer software for precision agriculture programs; Providing temporary use of non-downloadable computer software for use in issuing and providing receipts for others for electronic payments and payment transactions; Computer graphics design services, namely, creating of 3-D computer models; Database design and development; Electronic data storage; Farm product input services, namely, agricultural testing for determining soil nutrients and composition; Field scouting services, namely, observing and inspecting agriculture fields to identify problems associated with weeds, insects, and diseases; Mapping and surveying services for precision farming by means of the application and utilization of technologies and agronomic principles to manage spatial and temporal variability associated with all aspects of agricultural production using satellite imagery, GPS mapping, soil mapping, variable rate technologies, geospatial tools, and yield monitoring for improving the control and management of crops and increasing yields; Providing temporary use of non-downloadable electronic financial software that accommodates multiple types of payment and debt transactions in an integrated mobile device and web based environment; Providing temporary use of non-downloadable software for accessing, planning, and managing

information for use in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; Providing temporary use of non-downloadable software for budgeting, forecasting, and consolidation of financial data and financial reporting, and for use in financial reporting and analysis; Providing temporary use of non-downloadable software for recording field and crop observations related to pest pressure, for tracking field conditions with GPS-enabled maps, and for generating crop scouting reports; Providing temporary use of non-downloadable software that provides business management intelligence by combining information from various databases and presenting it in an easy-to-understand user interface; Providing temporary use of non-downloadable software for agricultural, automotive, energy, and industrial uses, namely, for use in data collection, aggregation, analysis, georeferencing, management, reporting, warehousing, employment recruiting, financial analysis, event logistics, order entry, payments, product selection and use, and publication distribution; Providing temporary use of non-downloadable software applications to assist with product selection in the automotive, energy, fuel, grease, lubricant, and oil sectors; Platform as a service (PAAS) featuring computer software platforms for agricultural fertilizer and nutrient monitoring and management in soil; Platform as a service (PAAS) featuring computer software platforms for inventorying, tracking, and verifying plant-available nitrogen in soil; Platform as a service (PAAS) featuring computer software platforms for nitrogen monitoring and management in soil; Professional consulting services about agricultural chemistry and fertility plans; Providing a website featuring agricultural research information in the fields of agronomy, farming, and crop yields; Providing a website featuring agricultural research information in the fields of biology, ecology, organisms, biosystematics, environment, biological control, entomology, mycology, and bacteriology; Providing a website featuring technology that allows users to access, plan, and

manage information in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; Providing an interactive web site featuring technology that enables users to enter, access, track, manage, monitor, and generate information and reports regarding sales of products and services; Providing an online non-downloadable internet based system in the nature of software applications featuring technology enabling users to access, plan, and manage information for use in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; Providing information for farmers in the fields of agricultural and crop research; Providing scientific information in the fields of agricultural research, agronomy, farming, crop yields, environmentalism, conservationism, biological diversity, global climate change, environmental sustainability, sustainable consumption, natural resource preservation, endangered species, sustainable business practices, environmental issues, soil sampling, crop observing, genetics, plant varieties, seeds, farming practices, harvesting, chemistry, crop production, crop costs, and crop health; Providing non-downloadable software applications featuring technology enabling users to access, plan, and manage information for use in the fields of agriculture, agronomy, automotive, energy, horticulture, and industrial equipment; Providing technological and scientific information about agricultural fertilizer and nutrient monitoring and management; Providing technological and scientific information about inventorying, tracking, and verifying plant-available nitrogen in soil; Providing technological and scientific information about nitrogen monitoring and management in soil; Providing temporary use of non-downloadable computer software for use in issuing and providing receipts for others for electronic payments and payment transactions; Providing temporary use of non-downloadable computer software that enables consumers and businesses to perform electronic payment transactions through the use of their electronic signature, personal identification number (PIN),

name, or photo; Providing temporary use of on-line non-downloadable cloud computing software for accessing, selecting, processing, downloading, and managing map-based data for use in agriculture; Providing temporary use of on-line non-downloadable computer software for payment processing, user authentication, and or management and tracking of payment transactions; Providing temporary use of online non-downloadable software for use in collecting, analyzing, and providing data and information regarding electronic payment transactions; Providing temporary use of on-line non-downloadable suite of software tools for agricultural field optimization and precision agriculture; Reporting of soil testing results directly to growers; Research and development in the field of agronomy, farming, and crop yields; Scientific data analysis services and custom development of computer software in the field of precision agriculture, namely, the use of sensors, maps, imagery, soil conditions, crop yield and other data to monitor and devise a plan for increasing crop yield, together with the use of equipment to carry out the devised plan; Scientific research services in the fields of genetics, plant varieties, seeds, agronomy, and plant harvesting and transformation methods; Providing temporary use of non-downloadable simulation software in the field of controlling agriculture and farm equipment and vehicles; Technical research in the fields of soil and agronomy; Providing temporary use of non-downloadable virtual reality training simulation software in the field of controlling agriculture and farm equipment and vehicles; Platform as a service (PAAS) featuring software in the fields of agriculture, agronomy, automotive, business, energy, finance, horticulture, and industrial equipment; Platform as a service (PAAS) featuring software for use in web applications, data storage and backup, database management, networking, collaboration, access, administration and management of computer applications and computer hardware; Non-downloadable computer software for browsing and accessing digital content, computer software

programs, audio works, visual works, audiovisual works, and electronic publications” in International Class 42 with the USPTO on November 13, 2019. (Marks appearing at Nos. 4-9 collectively referred to hereinafter as the “FS Marks”)

10. Growmark filed Cancellation Action No. 92,074,009 against Franklin Square’s Registration No. 5,102,059 for FS INVESTMENT SOLUTIONS on April 20, 2020.

11. Growmark filed Cancellation Action No. 92,074,010 against Franklin Square’s



Registration No. 4,989,475 for FS and Design INVESTMENTS on April 20, 2020.

12. Growmark filed Cancellation Action No. 92,074,011 against Franklin Square’s Registration No. 4,723,056 for FS INVESTMENTS on April 20, 2020.

13. Franklin Square has used its FS INVESTMENTS Mark since as early as May, 2009.

14. Growmark has used its FS Mark since as early as May, 1966.

15. Franklin Square’s FS INVESTMENTS Mark and Growmark’s FS Mark have co-existed on the Principal Register of the USPTO for over five years.

16. On September 2, 2020, counsel for Growmark provided that Growmark agrees that the three cancellation proceedings should be consolidated for efficiency purposes and consents to this Motion to Consolidate.

II. ARGUMENT

Rule 511 of the TBMP provides for consolidation of cases pending before the Trademark Trial and Appeal Board (“Board”) involving common questions of law or fact. TBMP § 511.

See also Fed. R. Civ. P. 42(a); *Bigfoot 4x4 Inc. v. Gold Circle Insurance Co.*, 226 U.S.P.Q. 262 (T.T.A.B. 1985); *World Hockey Ass'n v. Tudor Metal Products Corp.*, 185 U.S.P.Q. 246 (T.T.A.B. 1975).

In determining whether to consolidate proceedings, the Board weighs the savings in time, effort, and expense which may be gained from consolidation, against any prejudice or inconvenience which may be caused thereby. *See, e.g., World Hockey Ass'n*, 185 U.S.P.Q. 246 (consolidation ordered where issues were substantially the same and consolidation would be advantageous to both parties); Wright & Miller, *Federal Practice and Procedure: Civil* §2383 (1971). Further, the identity of the parties is another factor considered by the Board in determining whether consolidation should be ordered. *Bigfoot 4x4 Inc.*, 226 U.S.P.Q. 262.

In the present cases, the parties are identical: Growmark is the Petitioner in all three cancellation proceedings and, Franklin Square is the Registrant in all three cancellation proceedings. Further, Growmark has alleged the same registrations against all three cancellation proceedings so the rights asserted by Growmark are the same in all three cancellation actions. Moreover, all actions will involve facts surrounding Growmark's use of its FS Marks and the circumstances surrounding the use of these marks and Registrant's use of its FS INVESTMENTS, FS INVESTMENTS and Design and FS INVESTMENT SOLUTIONS Marks and the circumstances surrounding the use of these marks. Lastly, the parties will not be prejudiced by the consolidation because discovery has not yet occurred in any of the three cancellation proceedings. Consequently, time, effort, and expense will be minimized and neither party will be prejudiced or inconvenienced by the consolidation. Accordingly, Franklin Square requests that the cases be consolidated.

Respectfully submitted,

COZEN O'CONNOR



Camille M. Miller
1650 Market Street, Suite 2800
Philadelphia, PA 19103
(215) 665-7273; Fax: (215) 665-2013
cmiller@cozen.com
Attorneys for Franklin Square Holdings, L.P.

Dated: September 3, 2020

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing document was filed electronically with the Trademark Trial and Appeal Board, and mailed by first class mail, postage prepaid to the attorney of record for Growmark, Inc.:

Jamie Nafziger
Nafziger, Dorsey & Whitney LLP
50 South Sixth Street, Suite 1500
Minneapolis, MN 55402

Date: September 3, 2020



Camille M. Miller