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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GOOGLE INC., )  
)  
Plaintiff, )  
)  
vs. )  
)  
CENTRAL MFG. INC. a/k/a CENTRAL )  
MFG. CO., a/k/a CENTRAL MFG. CO. )  
(INC.), a/k/a CENTRAL )  
MANUFACTURING COMPANY, INC. )  
and a/k/a CENTRAL MFG. CO. OF )  
ILLINOIS; and STEALTH INDUSTRIES, )  
INC. a/k/a RENTAMARK and a/k/a )  
RENTAMARK.COM, )  
)  
Defendants. )

07CV385  
JUDGE KENDALL  
MAGISTRATE JUDGE COLE

**FILED**  
JAN 19 2007 NF  
JAN 19 2007  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**COMPLAINT**

Plaintiff Google Inc. ("Google"), by its attorneys and for its Complaint against Defendants, alleges as follows:

**Nature of This Action**

1. As the Seventh Circuit, Courts in this District and the Trademark Trial and Appeal Board repeatedly have found, Defendants and their alleged principal, Leo Stoller ("Stoller"), are engaged in a scheme of falsely claiming trademark rights for the purpose of harassing and attempting to extort money out of legitimate commercial actors, both large and small. Indeed, the judicial decisions awarding fees and otherwise imposing sanctions against Defendants and Stoller for their fraudulent and other illegal conduct, their assertion of rights that they do not own, their pattern of bringing meritless lawsuits and even their fabrication of evidence are legion.

2. Despite the admonitions of Courts and others, Defendants and Stoller have not only continued with, but expanded the scope of, their fraudulent scheme. Among other things, Defendants have fabricated, and threaten to continue to fabricate, non-existent entities that they falsely represent to unsuspecting victims are actual business entities. Defendants further falsely

claim that these non-existent entities have been using a wide array of trademarks on goods or services and otherwise have ownership and licensing rights to thousands of trademarks -- when in reality they have no such rights -- for the purposes of extracting money and obtaining the transfer of property to which Defendants are not entitled. To create an aura of legitimacy for their deceptive enterprise, Defendants have engaged in a widespread pattern of fraudulent acts that have included (i) preparing and circulating fabricated letterhead and other commercial documents supposedly evidencing the existence of their phony entities; (ii) repeatedly publishing advertisements and promotional materials which falsely claim rights to, and the ability to license, marks in which Defendants have no lawful interest and which falsely represent that Courts or others have upheld their alleged rights; (iii) disseminating false statements which represent that Defendants own federal registrations for marks when no such registration exists; (iv) asserting the ownership of fraudulently procured or fraudulently maintained federal registrations; (v) soliciting and employing perjured testimony and other materially false statements made under oath; and (vi) filing materially false documents with U.S. government agencies. Defendants employ these and other unlawful devices as described below to deceive, induce and coerce innocent parties into paying them money or else surrendering to Defendants property rights which Defendants then, in turn, use to defraud others. To date, Defendants have made hundreds of such misrepresentations to hundreds of legitimate companies.

3. Unfortunately, Plaintiff Google's widely-publicized success has attracted the attention of Defendants. As part of their scheme to defraud, Defendants have falsely represented that they own a federal registration for the GOOGLE mark, that they are owners of common law rights in the GOOGLE mark and that they have the right to license the GOOGLE mark to third parties. In order to effectuate their fraud, Defendants further have prepared and circulated, and continue to circulate, bogus letterhead and other corporate documents supposedly evidencing an entity they variously call "GOOGLE™ BRAND TRADEMARK LICENSING," "GOOGLE LICENSING [sic]" and "GOOGLE BRAND PRODUCTS AND SERVICES," even though by all indications no such entity exists. Defendants also have published, and continue to publish, promotional materials that falsely and deceptively represent that Defendants have rights to license the GOOGLE mark, that falsely claim that Defendants have successfully cancelled one or more of Plaintiff's federal trademark registrations for GOOGLE, and that otherwise misrepresent the nature of Defendant's goods, services and commercial activities.

4. Defendants' scheme is and has been with the intent to deceive. Defendants targeted Plaintiff Google, as well as hundreds of other legitimate companies, despite Defendants' knowledge that Defendants have no rights to the marks that they claim and no rights to license them to third parties. Defendants have falsely asserted, and continue to falsely assert, that they have such rights in order to defraud and extort their intended victims. After Plaintiff Google investigated Defendants' allegations of rights and refused Defendants' demands for money, Defendants not only persisted in their spurious demands for a pay-off, but also threatened to publicize their allegations which, they claimed, would bring about "the total destruction" of Plaintiff as a business.

5. Accordingly, Defendants have engaged in, and threaten in the future to engage in, acts of false advertising in violation of the Lanham Act, 15 U.S.C. § 1125(a)(1)(B), as well as acts of unfair competition. Furthermore, because Defendants constitute an enterprise engaged in a pattern of racketeering activity that has caused injury and damage to Plaintiff Google, they are liable under the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961 *et seq.* As a consequence of the foregoing, Google is entitled to monetary and injunctive relief against Defendants.

#### **The Parties**

6. Plaintiff Google Inc. is a Delaware corporation with its principal place of business in Mountain View, California. Plaintiff Google offers a variety of services and products, including a web site that provides the world's most popular Internet search engine and that is visited by more than 380 million users each month.

7. On information and belief, Defendant Central Mfg. Inc. is a Delaware corporation with its principal place of business in Oak Park, Illinois and operates under one or more aliases, including without limitation as Central Mfg. Co., Central Mfg. Co. (Inc.), Central Manufacturing Company, Inc. and/or Central Mfg. Co. of Illinois (collectively, "Central Mfg."). Defendant Central Mfg. has at all times relevant hereto conducted activities in interstate commerce.

8. On information and belief, Defendant Stealth Industries, Inc. ("Stealth") is a Delaware corporation with its principal place of business in Oak Park, Illinois. Defendant Stealth has at all times relevant hereto conducted activities in interstate commerce.

9. On information and belief, Rentamark, which is also known as Rentamark.com, is an unincorporated business entity with its principal place of business in Oak Park, Illinois.

According to sworn testimony by Stoller, Rentamark is operated by and a part of Defendant Stealth.

10. On information and belief, Stoller was CEO and shareholder of Defendant Central Mfg. and Defendant Stealth at all times relevant hereto. Stoller is also known by aliases that include Leo Reich. Stoller has at all times relevant hereto conducted the activities complained of herein in interstate commerce.

11. Defendant Stealth and Defendant Central Mfg. purport to be successors-in-interest of a defunct business named S Industries, Inc. Stoller was at all relevant times the President and a shareholder of S Industries, Inc.

### **Jurisdiction And Venue**

12. This action arises under the Trademark Act of 1946, Title 15, United States Code, the Racketeer Influenced and Corrupt Organizations Act, Title 18, United States Code and the law of Illinois and other states. The Court therefore has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338, 18 U.S.C. § 1964(c) and principles of supplemental jurisdiction under 28 U.S.C. § 1367(a).

13. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b) and 1391(c) and 18 U.S.C. §§ 1965(b) and 1965(d). Defendants reside in, are found in, transact affairs in and are subject to personal jurisdiction in this District, and a substantial part of the events giving rise to the claims herein occurred in this District.

### **Facts**

#### **Defendants' Fraudulent Conduct Using SI**

14. S Industries, Inc. ("SI"), the claimed predecessor of Defendant Central Mfg. and Defendant Stealth, was incorporated in or about 1985. Stoller acted as SI's principal. During that time in the 1980s, according to Stoller, SI engaged in the business of importing sporting goods such as tennis rackets from manufacturers in Taiwan and other Asian countries.

15. In or about January 1990, Stoller was evicted from the business premises of SI. By that point, while SI nominally moved to Stoller's house, it was defunct as a business. As Stoller subsequently admitted during a 2001 deposition, and contrary to his prior sworn statements otherwise to the Courts and the U.S. Trademark Office, SI had at best only "very nominal, or de minimis" sales by and throughout the 1990s.

16. No longer conducting legitimate operations by or in about 1990, SI and Stoller focused their energies on a new "business" model. This included, in particular, the implementation of a widespread scheme of asserting rights to trademarks, including by way of purported federal registrations, that SI and Stoller knew they had no rights to in order to fraudulently extract money from businesses and individuals.

17. Among other things, Stoller was well aware that common law trademark rights are acquired only through sufficient bona fide use in commerce and that such use is also required for the legitimate acquisition and maintenance of use-based federal trademark registrations. Even though SI was effectively dissolved and thus not using any marks in commerce in a manner and to an extent necessary for trademark rights, SI and Stoller nevertheless represented that they owned non-existent trademark rights and sought to assert them by demanding the payment of license fees and by threatening and filing sham litigation for the purpose of extorting money or property from their victims. Between 1995 and 1997 alone, SI and Stoller filed no fewer than 35 trademark lawsuits in the United States District Court for the Northern District of Illinois alone. A list of those cases is attached as Exhibit A hereto and is incorporated herein by this reference.

18. The Seventh Circuit and this Court found that the suits filed and prosecuted by SI and Stoller were part of a pattern of vexatious litigation that falsely claimed rights to marks they did not own and had no lawful right to assert. Those rulings included the following:

(a) In *S Industries, Inc. v. Centra 2000, Inc.*, 249 F.3d 625, 627-29 (7th Cir. 2001), the Seventh Circuit found that SI and Stoller's assertion of trademark rights was groundless and affirmed an award of attorneys' fees against SI for filing "meritless claims" and engaging in other litigation misconduct, which the Seventh Circuit found was part of a "pattern of abusive and improper litigation with which the company and Lee Stoller, its sole shareholder, have burdened the courts of this circuit." Although this suit resulted in a fee award against SI and/or Stoller, upon information and belief such award has not been paid.

(b) In *S Indus., Inc. v. Stone Age Equip., Inc.*, 12 F. Supp. 2d 796, 798-99, 819 (N.D. Ill. 1998) (Castillo, J.), the Court awarded attorney's fees against SI for its "continuing pattern of bad faith litigation." The Court also found that the documentary evidence submitted by SI and Stoller was "highly questionable" and "perhaps fabricated" and that Stoller's sworn testimony was "inconsistent, uncorroborated, and in some cases, demonstrably false."

(c) In *S Industries, Inc. v. Diamond Multimedia Sys., Inc.*, 17 F. Supp. 2d 775, 779 (N.D. Ill. 1998) (Andersen, J.), the Court awarded fees against SI based on findings that its claims were "patently frivolous" and that it had "apparently taken a legitimate procedure designed to protect trademark rights and turned [it] into a means of judicial extortion."

19. In addition to filing and prosecuting numerous sham lawsuits in the Courts, SI and Stoller instituted and prosecuted a flurry of sham proceedings before the United States Trademark Trial and Appeal Board ("TTAB" or the "Board") based on their fraudulent claims of trademark rights. Those proceedings resulted in decisions that included the following findings by TTAB:

(a) In *S Indus., Inc. and Central Mfg. Co. v. JL Audio, Inc.*, Opposition No. 110,672, Order of May 13, 2003 (TTAB), the Board stated that "Mr. Stoller's and opposers' litigation strategy of delay, harassment and even falsifying documents in other cases is well documented" and further noted Stoller's history of being "sanctioned, individually, for making material misrepresentations."

(b) In *S Indus., Inc. and Central Mfg. Co. v. Casablanca Indus., Inc.*, Cancellation No. 92024330, Order of Oct. 3, 2002 (TTAB), the Board likewise observed that Defendant Central Mfg.'s and Stoller's "litigation strategy of delay, harassment, and falsifying documents in other cases is well documented."

(c) In *S Indus., Inc. v. S&W Sign Co., Inc.*, Opposition No. 91102907 (Dec. 16, 1999), the Board noted that "[t]he lack of credibility of Mr. Stoller is a matter of public record."

(d) In *S. Indus. Inc. v. Lamb-Weston Inc.*, 45 U.S.P.Q.2d 1293, 1295 (TTAB 1997), the Board found that SI and Stoller had made "fraudulent" statements under oath in order to backdate pleadings filed with the Board.

**Defendants' Fraudulent Acquisition Of Federal Registrations From SI**

20. SI, through Stoller, purported to assign several federal trademark registrations and applications to Defendant Central Mfg. Many of the alleged assignments were dated on or about June 5, 1994, but were not recorded with the U.S. Trademark Office until various times in or after 1998. The registrations and applications allegedly assigned by SI to Defendant Central Mfg. include those that are listed in Exhibit B hereto and are incorporated herein by this reference.

21. The assignments from SI to Defendant Central Mfg. for the registrations and applications listed in Exhibit B hereto were knowingly and deliberately fraudulent on the part of Stoller and Defendant Central Mfg. Defendant Central Mfg., Defendant Stealth and Stoller also utilized these purported registrations as vehicles to perpetrate an intentional pattern of fraud on a significant number of persons and companies, as well as on the Courts and TTAB. Among other things:

(a) SI had ceased operating as an actual business years before the alleged assignments. Not only had SI's rights in the marks accordingly been abandoned (assuming they ever existed), but the subsequent purported assignments were not accompanied by any assets or existing, on-going business. Nor did the assignment agreements -- which recited that the transfers of the registrations were only for nominal consideration -- reflect any such transfer of any assets or existing, on-going business. As such, and as has been known to Defendants at all material times, because no existing good will accompanied them, the ostensible transfers were assignments-in-gross that rendered invalid both the registrations and any common law rights, even assuming any such rights ever once existed.

(b) According to sworn testimony by Stoller, SI had allegedly transferred ownership of most or all of the registrations and applications set forth in Exhibit B to Defendant Central Mfg. in or about 1994. Nevertheless, after the alleged assignments, SI and Stoller continued to fraudulently hold out SI as the owner of intellectual property and to fraudulently file and prosecute, in the name of SI, lawsuits in the Courts and proceedings before TTAB. In the United States District Court for the Northern District of Illinois during the years 1996 and 1997, SI and Stoller initiated at least 35 suits in SI's name that misrepresented that SI was the owner of the registrations and applications asserted in those cases and that SI was the owner of the common law trademark rights asserted in those cases. See Exhibit A hereto.

(c) Likewise, in TTAB, SI and Stoller initiated numerous proceedings in SI's name that alleged SI was the owner of the registrations, both after SI had ceased to effectively exist and after SI had purportedly transferred the registrations to Defendant Central Mfg. Examples of such fraudulently commenced and prosecuted proceedings in TTAB include without limitation each of the following:



<b>Proceeding No.</b>	<b>Registration No.</b>	<b>Filing Date of Proceeding by SI and Stoller</b>	<b>Date of Alleged Assignment of Registration to Central Mfg.</b>	<b>Other Party to Proceeding</b>
91110672	1717010	05/29/1998	12/29/1997	JL AUDIO, INC.
91110659	2140524	03/23/1998	06/05/1997	ENTRA TECHNOLOGIES COMPANY
92027323	2057613	01/23/1998	11/01/1997	ROSE'S RESTAURANT'S INC.
91108615	1326765	11/17/1997	06/05/1997	INTRACO FOODS PTE LTD.
91107902	1623790	09/12/1997	06/05/1996	REALITY BYTES, INC.
91107648	2064576	09/03/1997	06/05/1997	GLOBAL UPHOLSTERY COMPANY
91107040	1326765	07/10/1997	06/05/1997	ST. JOSEPH LIGHT & POWER CO.
91106515	1326765	06/06/1997	06/05/1997	SENTRACHEM LIMITED
91110350	1615004	05/01/1998	09/01/1997	KAYDON CORPORATION
91109973	1615004	03/25/1998	09/01/1997	MANCO PRODUCTS, INC.
91108480	1615004	11/05/1997	09/01/1997	TERMINATOR TURTLE, LP

(d) Stoller and SI also filed knowingly fraudulent papers with the U.S. Trademark Office in order to unlawfully maintain the registrations that had allegedly been



transferred to Defendant Central Mfg. For example, SI, through Stoller, purported to assign Registration No. 1,564,751 for AEROSPACE to Defendant Central Mfg. on or about June 5, 1994. Nevertheless, on or about November 11, 1994, SI, through Stoller, filed a sworn statement with the U.S. Trademark Office to obtain supposed incontestability status for the registration that averred SI had continuously been using the mark on the goods listed in the registration, that it was still doing so and that SI was the owner of the purported registration. Even to this day, SI holds itself out as the purported owner of Registration No. 1,564,751.

(e) The registrations and applications listed in Exhibit B attached hereto were, and are, invalid and fraudulent for the further, independent reason that the alleged assignments from SI were to a non-existent entity. The assignee named by SI and Stoller in their transfer documents and in their filings with the Courts and TTAB is listed as "Central Mfg. Co." Although a company named Central Mfg. Inc. apparently is a legal entity under the laws of Delaware, Central Mfg. Co. does not exist and never has existed. Nor was Stoller's misidentification inadvertent. Rather, as the Court found in *Central Mfg. Co. v. Pure Fishing, Inc.*, No. 05 C 725 (N.D. Ill) (Lindenberg, J.) as discussed further below, Stoller's misrepresentations about the corporate status of "Central Mfg. Co." were intentional so as to mislead and defraud those who dealt with the non-existent "Central Mfg. Co." and to perpetrate a fraud on the Courts by enabling and concealing Defendants' false assertions of trademark rights.

(f) In addition, Stoller has obtained, through baseless assertions of rights and by threatening and instituting sham litigation, the transfer of trademark applications and registrations previously held by third parties to Defendant Stealth and Defendant Central Mfg. These include without limitation U.S. Trademark Application Nos. 74-735,867, 74-735,868, 74-493,718, 74-475,481, 74-340,300, 74-476,028, 74-630,176, 74-734,680, and 74-534,766 as well as U.S. Trademark Registration Nos. 1,717,010, 1,766,806 and 2,269,113. Upon information and belief, these transfers were also invalid assignments-in-gross, including without limitation in that they were not accompanied by any assets or existing, on-going business, and furthermore were not validly maintained, including without limitation in that the alleged marks were not used in commerce in connection with the goods or services set forth in the applications and registrations. Nevertheless, Defendants have misused these applications and registrations to claim rights they do not own, to fraudulently demand licensing fees and to threaten sham

lawsuits against others, despite Defendants' knowledge that such applications and registrations are not, and were not, valid.

**Defendants Continue, And Expand, Their Pattern Of Fraud**

22. Since the time of the alleged assignment of the registrations and applications from SI, Defendant Central Mfg., Defendant Stealth and Stoller have engaged in, and continue to engage in, numerous fraudulent business practices as part of a scheme to extort money and property from innocent individuals and innocent companies, both large and small. As described further below, these practices include:

(a) false claims, including through the creation and circulation of fraudulent commercial documents, that non-existent entities are actual, legitimate businesses and that such non-existent entities have ownership and/or licensing rights to trademarks;

(b) false claims of right to intellectual property that Defendants know they do not own and have no colorable right to;

(c) false claims to own federal trademark registrations that Defendants know they do not own and in some instances do not even exist;

(d) the filing of fraudulent documents with U.S. government agencies;

(e) representations that Defendants offer or have offered goods or services that they have not, and in some cases never have, supplied;

(f) false representations that they provide legal services, even though they are not admitted in any State to practice law;

(g) unlawful threats to disseminate, and the unlawful dissemination of, false representations about targeted companies or individuals in the media or to the public if they do not pay money or surrender rights as demanded by Defendants; and

(h) threatening and instituting sham trademark lawsuits and other frivolous legal proceedings.

23. This and other Courts repeatedly have confirmed that Defendants continue to engage in a pattern of falsely claiming rights to marks they do not own, including by the fabrication of evidence and the provision of false testimony, and continue to attempt to enforce those non-existent rights by threatening and filing frivolous litigation, including in some instances by the use of false names. In addition to the decisions involving Stoller, Defendant Central Mfg. and SI that are discussed above, such decisions include the following:

(a) In *Central Mfg. Co. v. Brett*, No. 04 C 3049 (N.D. Ill) (Coar, J.), the Court ruled that Defendant Central Mfg. and Stoller lacked the trademark rights they had claimed and on that basis, among others, entered judgment against them. It further observed that "Stoller appears to be running an industry that produces often spurious, vexatious, and harassing federal litigation" and recited the findings by "several courts in this district" that Stoller and Defendant Central Mfg. are "engage[d] in a pattern and practice of harassing legitimate actors for the purpose extracting a settlement amount." The Court ordered them to pay an award of attorneys' fees based on findings that "Leo Stoller and his companies present paradigmatic examples of litigants in the business of bringing oppressive litigation designed to extract settlement" and that they had offered "questionable, and seemingly fantastical documents" and "inconsistent, uncorroborated, or arguably false testimony." As a further part of that decision, the Court reviewed and summarized the terms of the "settlement agreements" that Stoller and Defendant Central Mfg. alleged evidence their trademark rights and found that they, in fact, confirmed such Defendants had "engage[d] in a pattern and practice of harassing legitimate actors for the purpose of extracting a settlement amount. The judicial system is not to be used as an aid in such deliberate, malicious, and fraudulent conduct."

(b) In *Central Mfg. Co. v. Pure Fishing, Inc.*, No. 05 C 725 (N.D. Ill) (Lindenberg, J.), the Court entered judgment against Defendant Central Mfg. as a sanction for Defendant Central Mfg.'s and Stoller's abuse of the legal process. In doing so, the Court found that Stoller "has earned a reputation for initiating spurious and vexatious federal litigation." In the case before it, the Court found that Stoller, Defendant Central Mfg. Co. and their counsel had engaged in "gross misconduct" and "unethical conduct" which included Stoller's signing of pleadings with counsel's name even though Stoller is not a lawyer; had brought motions "that lacked any evidentiary support" and were otherwise "baseless"; and had evinced "flagrant contempt for this Court" and "an appalling lack of regard" for the judicial process. In particular, the Court ruled that "Central Mfg. Co., through Mr. Stoller," and their counsel violated Federal Rule of Civil Procedure 11(b) "by maintaining that Central Mfg. Co. was a Delaware corporation," even though it was not. As it explained:

Contrary to the statements in Central Mfg. Co.'s initial and amended complaints, it is not an independent legal entity and is not incorporated under the laws of Delaware. Central Mfg. Co. filed an amended complaint with this Court on May

26, 2005 stating that it was a Delaware corporation, while almost simultaneously filing a motion before Judge Hart stating that Central Mfg. Co. was a d/b/a for Central Mfg. Inc. *See Columbia Pictures Industries, Inc. v. Stoller, et al.*, 05 C 2052. Plaintiff, through Mr. Stoller, filed this case under a false name. Since the inception of this case, and unquestionably prior to filing the amended complaint, Mr. Stoller knew that he had not incorporated Central Mfg. Co. However, Mr. Stoller likely attempted to conceal this fact from the Court because the trademark registrations that are the basis for the infringement claims, state that Central Mfg. Co., not Central Mfg. Inc., owns sole title to the disputed marks. The conduct of Central Mfg. Co., through Mr. Stoller, is akin to the conduct in *Dotson*. 321 F.3d 663. In *Dotson*, the Seventh Circuit upheld dismissal of a plaintiff's case with prejudice as a sanction for filing suit under a false name. *Id.* at 668. Accordingly, Central Mfg. Co. and Mr. Stoller deserve the same sanction for filing suit on [be]half of a false corporation.

(c) In *Central Mfg. Co. v. Medtronic Sofamor Danek Inc.*, Opposition Nos. 9115485 and 91154617 (TTAB Feb. 19, 2004), the Board imposed Rule 11 sanctions against Defendant Central Mfg. for filing motions that were "without merit, constitute harassment, and can only be assumed to have been brought for purposes of delay."

(d) In *Central Mfg. Inc. v. Third Millenium Tech. Inc.*, 61 U.S.P.Q. 1210, 1214-15 (TTAB 2001), the Board found that Stoller and Defendant Central Mfg. had "engaged in a pattern" of submitting papers that were based on "false statements and material misrepresentations." It ruled, in particular, that Stoller and Defendant Central Mfg. had filed requests for extensions of time on the basis of non-existent settlement negotiations and had "acted in bad faith and for improper purposes, i.e., to obtain additional time to harass the applicant, to obtain unwarranted extension of the opposition period, and to waste resources of applicant and the Board."

24. Undeterred by these and similar rulings, Defendants to this day have continued, and even expanded, their fraudulent scheme by now falsely claiming that they own rights in, and have the right and ability to license, many thousands of trademarks. As described below, Defendants have repeatedly made these misrepresentations in commercial advertising and to hundreds of companies and individuals, including Plaintiff, targeted by Defendants for extortion.

25. Since November 2005 alone, Defendants filed more than 1800 requests for extensions of time to oppose applications for trademark registrations that had been published by the United States Trademark Office. Simultaneous with this proliferation of filings, Defendants have sought to extract money or property out of at least many hundreds of applicants by asserting that Defendants purportedly own rights to all of these many hundreds of marks which have been the subject of those applications.

26. Many of these extortionate demands and false representations directed to applicants for registration are evidenced in Defendants' sham filings with the Trademark Office itself. For example, Defendants' April 12, 2006 request for an extension of time to oppose Application Serial No. 78192386 for "VP VENTURES" includes the following:

Please contact (773-589-0915 FAX) VENTURE BRAND LICENSING to resolve this trademark controversy VENTURE v VP VENTURES and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your VENTURE BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.

A true and correct copy of the April 12, 2006 request is attached hereto as Exhibit C.

27. Many of Defendants' more than 1800 filings included virtually identical language, except that they substitute a different alleged licensing entity that purports to have a name supposedly similar to the mark which was the subject of the application -- such as "ELLA BRAND LICENSING," "FINGO BRAND LICENSING," "SKILL BRAND LICENSING," "MERMAID BRAND LICENSING," "DIAMOND BRAND LICENSING," "STRA BRAND LICENSING," "WORKOUT BRAND LICENSING," "FRIENDS NETWORK BRAND LICENSING," "SIFI BRAND LICENSING," "PM BRAND LICENSING," "NANO BRAND LICENSING," "HAPPY BRAND LICENSING," "LAKE BRAND LICENSING" and "RUNNER BRAND LICENSING." True and correct copies of examples of these additional requests are attached hereto as Exhibit D.

28. The representations contained in Defendants' more than 1800 filings described above as well as their associated communications were, and are, knowingly false.

(a) The multitude of licensing companies claimed by Defendants do not exist, nor did they own the purported rights to the marks claimed. Not only did Stoller's bankruptcy

filing in December 2005 make no mention that he has ownership interests in any of these hundreds of supposed entities, but by an Order dated July 14, 2006 TTAB ruled that neither Stoller nor his supposed entities owned the rights they proclaimed to have. In its July 14, 2006 Order, TTAB initially referenced the "pattern of misconduct and abuse of the TTAB's processes" over the course of "many years" by Stoller and the purported entities associated with him. Although TTAB had ordered Defendants to provide "for each of the marks for which you requested an extension of time to file an opposition, evidence that supports a claim that you may be damaged by registration of the mark" and to "demonstrate that the extension requests were not filed for improper purposes but, instead, were based on cognizable rights you may have arising under the Trademark Act," Defendants provided no such proof: "Your submissions do not substantiate your rights in any of the claimed marks, let alone support a colorable claim of damage. . . . You submitted no evidence of products or services bearing these alleged marks, no evidence that you have sold any products or services under these marks, and no evidence of your advertising of goods or services with these marks." As TTAB observed, the evidence Defendants did submit only served to "reinforce the conclusion that you are holding up thousands of applications in an attempt to coerce applicants to license, i.e., 'rent,' trademarks to which you have not demonstrated any proprietary right." TTAB thus found that Defendants had "filed the extension requests for improper purposes, namely, to harass the applicants to pay you to avoid litigation or to license one of the marks in which you assert a baseless claim of rights." For those violations, which were deemed to constitute "egregious" misconduct, the Board imposed an array of sanctions, including dismissal of the TTAB proceedings filed by Defendants which were the result of their frivolous requests for extension of time. A true and correct copy of TTAB's July 14, 2006 Order is attached hereto as Exhibit E.

(b) Furthermore, Defendants are not qualified to practice law in any state and are not entitled to engage in the practice of law. Nevertheless, in their abusive filings described above, Defendants have solicited payment for the provision of legal services such as "brief writing," "drafting pleadings" and "legal research." Not only do such acts constitute the unauthorized practice of law by Defendants, but Defendants tout these false representations in order to cause targeted victims to erroneously believe that Defendants are authorized to engage in the practice of law, including for its *in terrorrum* effect and to deceive victims into capitulating to their extortionate demands.



29. Defendants also have made fraudulent representations in advertising and promotions through commercial web sites that they have published and displayed, and continue to publish and display.

30. Defendant Stealth and Stoller have represented on the site located at [www.rentamark.com](http://www.rentamark.com), and continue to represent, that "RENTAMARK.COM is an independent, full service, international licensing and merchandising agency. RENTAMARK.COM owns and controls over 10,000 famous trademarks specializing in the trademark licensing business." Elsewhere on that site, Defendant Stealth and Stoller represent: "RENTAMARK.COM is able to license your company with any one of our famous trademarks that will allow your business to sell its products and services worldwide. Below are our Licensed Word Marks. To view our e-Marks, simply click on the button in the control panel." That page then links to other pages that list many thousands of terms that Defendants claim to own and have the right to license. True and correct hard copy excerpts from Defendants' web site pages are attached hereto as Exhibits F and G.

31. The foregoing representations contained on Defendants' site are false. As to all or virtually all of the marks to which Defendants claim rights, Defendants do not have, and never have had, subsisting federal registrations for such marks and have not used such terms as marks or trade names in interstate commerce. Furthermore, Stoller's bankruptcy filing in December 2005 made no mention that he has purported ownership interests in any of the thousands of marks listed on the [rentamark.com](http://rentamark.com) web site.

32. Confirming the bad faith and extortionate purpose behind Defendants' ever-proliferating, false claims of right, Defendants' latest campaign also came on the heels of recent Court actions that raise the prospect of imposing substantial monetary liability for Defendants' frivolous legal proceedings and other misconduct. The *Central Mfg. Co. v. Brett* decision quoted above was issued on September 30, 2005. This was soon followed by the decision quoted above in *Central Mfg. Co. v. Pure Fishing, Inc.* on November 16, 2005. In both cases, the Court ruled that Defendant Central Mfg. and Stoller are liable to pay attorneys' fees and costs, and the parties in those cases are seeking more than \$700,000 in reimbursement from Defendant Central Mfg. and Stoller.



**Defendants' Scheme To Defraud Targeting Plaintiff Google**

33. It is in the context of Defendants' expanded scheme of making spurious claims of right to many thousands of marks, and their continuing pattern of unlawfully demanding licensing fees and threatening and filing sham legal proceedings, that Defendants targeted Plaintiff Google.

34. As one of the some 1800 requests for extension of time filed by Defendants with TTAB since November 2005, Defendant Central Mfg. and Stoller sought on November 27, 2005 a request for an extension of time to oppose an application for registration filed by Plaintiff Google. A true and correct copy of Defendants' November 27, 2005 request, which was sent by means of the U.S. mail and interstate wires on or about November 27, 2005 and at times thereafter, is attached hereto as Exhibit H.

35. On or about November 29, 2005, by means of the U.S. mail and interstate wires, Defendants sent a letter that purported to be on the letterhead of an entity called "GOOGLE BRAND PRODUCTS & SERVICES," which claimed to have been in business "SINCE 1981." In it, Defendants alleged to "hold common law rights" in the mark GOOGLE and to "have been using the similar mark GOOGLE for many years." The letter was signed "Leo Stoller GOOGLE." A true and correct copy of Defendants' November 29, 2005 letter and its attachments is annexed hereto as Exhibit I.

36. The attachments to the November 29, 2005 letter were also sent by means of U.S. mail and the interstate wires. In the proposed "Agreement To Discontinue Use (Covenant Not To Sue)" and the proposed "Settlement Agreement" attached to the letter, Stoller and Defendant Stealth proclaimed their "ownership of the mark GOOGLE," and the signature block to the proposed agreement was signed by Stoller for "GOOGLE" and as a "[r]epresentative of GOOGLE." Furthermore, both documents purported to identify Defendant Stealth (under the alias "Rentamark") as "Google." Elsewhere in the attachments, Defendants purported to identify the entity preparing the attachments as an entity named "GOOGLE" and included an alleged notice that the materials were "© GOOGLE 2000."

37. In the attachments to the November 29, 2005 letter sent by U.S. mail and interstate wires, Defendants also repeatedly represented that they owned a federal trademark registration for "Google" by use of the "®" symbol, including in the attachments entitled: "Why

Obtain A GOOGLE® License . . .," "GOOGLE® Licensing Program Licensee Requirements," "GOOGLE® Licensing Program," and "Licensing GOOGLE® Enables You To . . .".

38. In or about April or May 2006, Defendants sent by U.S. mail to Plaintiff correspondence with a return address label which falsely represented that it had been sent by an entity called "GOOGLE LICENSING [sic]" and which reflected Defendants' address in Oak Park, Illinois. (The exact day of this fraudulent mailing cannot be ascertained because, in violation of U.S. Postal Service Regulations, Defendants omitted the date from their postage meter stamp.) A true and correct copy of this mailing label is attached hereto as Exhibit J.

39. On April 10, 2006, Stoller and Defendant Stealth transmitted to Plaintiff by the interstate wires two documents that purported to be from an entity called "GOOGLE™ BRAND TRADEMARK LICENSING." True and correct copies of these faxes from Defendants are attached hereto as Exhibits K and L.

40. Beginning on or about April 28, 2006, Stoller and Defendant Stealth also represented on the rentamark.com web site that that "GOOGLE" was, and is, among the marks that they purport to "own and control" and that they offer for licensing to third parties. True and correct copies of the relevant web pages are attached hereto as Exhibit M.

41. Each of the foregoing representations of fact by Defendants recited above in paragraphs 35 through 40 above were, and are, false and made by Defendants with the intent to deceive. As Defendants have known at all relevant times, those statements were false in at least each of the following respects:

(a) Defendants knowingly misrepresented the existence of an entity or entities variously called by Defendants as "GOOGLE BRAND LICENSING AND PRODUCTS," "GOOGLE LICENSING [sic]" and "GOOGLE™ BRAND TRADEMARK LICENSING." No such entities exist, but are a fabrication by Defendants, and the commercial letterhead, fax cover sheets, labels and other commercial documents allegedly reflecting their existence are fraudulent.

(b) Defendants' representations to have common law rights in or to "Google" as a mark or trade name are fraudulent. Defendants own no right, title or interest of any kind in "Google" as a mark, trade name or designation of origin. Defendants have not used "Google" as a mark or trade name, whether directly or through any licensee, in connection with bona fide sale of goods or services. No segment of the consuming public associates "Google" with Defendants or with any goods or services originating from or associated with Defendants. Defendants have

no right to license "Google" as a mark or trade name to any person or entity. Indeed, because Defendants' claim of right to "Google" was part and parcel of their more than 1800 filings with TTAB since November 2005, TTAB already has found pursuant to the July 14, 2006 Order that Defendants' assertion of rights to the "Google" mark was "baseless" and made for the unlawful purpose of seeking to extort money from Plaintiff. For those reasons, TTAB dismissed outright Defendant Central Mfg.'s sham opposition proceeding against Plaintiff. A true and correct copy of TTAB's dismissal Order is attached hereto as Exhibit N. Nevertheless, to this day and as shown above, Defendants continue to hold themselves out as the owner of rights to the "Google" mark and offer to license "Google" as a mark to third parties.

(c) Defendants' further claims that they have a federal trademark registration for "Google," made through their repeated uses of the statutory federal registration notice "®" and elsewhere, are false. Neither Defendants nor Stoller own any federal registration for "Google."

42. Defendants also have made materially false representations of fact regarding Defendants' purported success in litigation and in TTAB proceedings for the purpose of deceiving and coercing their victims into paying money and bolstering their false claims of right to trademarks, including as to "Google." Examples of such misrepresentations include:

(a) In a March 31, 2006 email to Plaintiff sent by means of the interstate wires, Defendants, through Stoller, falsely asserted that "99% of my opponents opt to settle" and that "Google is in the 1% category that refused to pay any deference to my early on trays [*sic*] for a quick settlement." A true and correct copy of the March 31, 2006 email is attached hereto as Exhibit O.

(b) According to claims on Defendants' rentmark.blogspot.com web site beginning on or about April 20, 2006 and continuing through the present: "Stoller has thus far prevailed in over 90% of its [*sic*] police actions against third party infringers. Companies like Wal-Mart, K-Mart and hundreds of other well known American companies have acknowledged Stoller's superior rights to its [*sic*] marks as a result of trademark litigation." A true and correct hard copy printout of Defendants' relevant web pages is attached hereto as Exhibit P.

(c) Beginning on or about April 20, 2006 and continuing through the present, Defendants claimed on the www.rentmark.blogspot.com web site that "STOLLER CANCELS THE GOOGLE TRADEMARK." See Exhibit P attached hereto.

(d) Beginning on or about June 16, 2004 and continuing through the present, Defendants claimed on the [www.rentmark.blogspot.com](http://www.rentmark.blogspot.com) web site that "Leo Stoller has participated in over 200 inter party [*sic*] proceedings over 25 years prevailing in [*sic*] over 95% of the time and over 60 district court trademark cases." A true and correct hard copy printout of Defendants' relevant web pages is attached hereto as Exhibit Q.

43. The foregoing representations of fact by Defendants set forth in paragraph 42 above were, and are, false. Neither Defendants nor Stoller have cancelled any registration owned by Plaintiff. Moreover, Defendants' representations as to its "success" in litigation are fictional. Defendants have not prevailed in "over 90%" or "over 95%" of its legal actions or obtained settlements from "99%" of those companies and individuals Defendants have targeted. To the contrary, as the Court observed in the *Brett* decision discussed above: "no Court has ever found infringement of any trademark allegedly held by Stoller or his related companies in any reported opinion." Indeed, as described above, Courts have repeatedly found lawsuits brought by Defendants and Stoller to be part of a pattern of sham litigation and have repeatedly sanctioned them for their groundless claims of trademark rights, their fabrication of evidence, their provision of false testimony and their other abuses of the judicial system.

44. In addition to their repeated assertion and dissemination of materially false statements, Defendants also made repeated unlawful threats against Plaintiff. These include without limitation:

(a) Defendants' November 29, 2005 letter attached as Exhibit I hereto contained threats to bring sham legal proceedings and to harass, including by threatening to conduct "extensive discovery" which included depositions of Applicant's "executive officers," and referenced the fact that the mere filing of a legal proceeding, regardless of its lack of merit, would cost Plaintiff at least \$150,000. In exchange for refraining from inflicting such damage, Defendants demanded that Plaintiff either pay them money in the amount of at least \$100,000 or else cease all use of GOOGLE in connection with Plaintiff's business.

(b) Defendants' March 31, 2006 email attached as Exhibit O hereto threatened to "refe[r]" Plaintiff's executives "to the US Attorney for a perjury charge should they lie under oath."

(c) In a February 9, 2006 email, Stoller and Defendant Stealth threatened to publicize their allegations, which they claimed would mean "Google's stock won't be worth

\$5.00 a share" and would result in "the total destruction" of Applicant. A true and correct copy of the February 9, 2006 email is attached hereto as Exhibit R.

(d) In a March 2, 2006 email, Stoller and Defendant Central Mfg. again threatened to publicize their allegations with the intention of "driv[ing] down Google stock price" and then concluded with the statement that "I would not be surprised [sic] if Google goes out of business by the conclusion of this proceeding." A true and correct copy of the March 2, 2006 email is attached hereto as Exhibit S.

### COUNT I

(15 U.S.C. § 1125(a)(1)(B) -- Against All Defendants)

45. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 43 above, as though fully set forth at length.

46. Defendants have made and disseminated, and continue to make and disseminate, false statements of fact in commercial promotions and advertisements about their goods, services and commercial activities. Such misrepresentations by Defendants include without limitation those set forth in paragraphs 26(a) through 31, 40, 42(b)-(d) and 43 above. Such statements are literally false and have a tendency to deceive a substantial segment of their audience.

47. Defendants have caused and continue to cause their false and misleading statements to enter interstate commerce, including by means of the Internet.

48. By reason of the acts alleged herein, Defendants have misrepresented, in commercial advertising and promotion, the nature, characteristics and qualities of their goods, services and commercial activities in violation of 15 U.S.C. § 1125(a)(1)(B).

49. Defendants' acts complained of herein have damaged and will continue to damage Plaintiff irreparably. Plaintiff has no adequate remedy at law for these wrongs and injuries. The damage to Plaintiff includes harm to its reputation that money cannot compensate. Plaintiff is, therefore, entitled to an injunction restraining and enjoining Defendants and their agents, servants and employees, and all persons acting thereunder, in concert with, or on their behalf, from engaging in false advertising and from otherwise making or utilizing false and misleading statements in connection with the promotion, advertisement or sale of goods, services and commercial activities.

50. Plaintiff has been and is likely in the future to be injured as result of Defendants' false statements. Plaintiff is entitled to recover three times its damages, to an accounting of Defendants' profits and to disgorgement of Defendants' ill-gotten gains, together with Plaintiff's attorneys' fees and costs, pursuant to 15 U.S.C. § 1117.

## COUNT II

(18 U.S.C. §§ 1962(c) and 1964(c) -- Against All Defendants)

51. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 44 above, as though fully set forth at length.

52. Stoller is a "person" within the meaning of 18 U.S.C. § 1961(3). Stoller, Defendant Central Mfg. and Defendant Stealth constitute an enterprise within the meaning of 18 U.S.C. § 1961(4) in that they constitute a union and group of individuals and entities associated in fact although not a legal entity. Said enterprise evinces a hierarchy and structure separate and apart from the pattern of racketeering alleged herein, including without limitation in that Defendant Central Mfg. and Defendant Stealth purport to engage in legitimate activities in addition to the unlawful activities alleged in this Complaint.

53. Defendant Central Mfg., Defendant Stealth and Stoller, directly and indirectly as stated in 18 U.S.C. § 1962(c), execute an enterprise in and affecting interstate commerce by fraudulent, deceitful and extortionate practices as the term "enterprise" is defined in 18 U.S.C. § 1961(4), including through without limitation the predicate acts of mail fraud and wire fraud and the predicate acts of extortion. In particular, these racketeering activities include:

(a) Acts And Threats Involving Extortion: On or about the date indicated in and as described in paragraph 44(b) above, Defendant Central Mfg., Defendant Stealth and Stoller, without lawful authority and with an intent to cause another to perform or to omit the performance of any act, communicated a threat to accuse a person of an offense, in violation of 720 ILCS 5/12-6 and 720 ILCS 5/15-5, and furthermore to harm the business repute of another, in violation of 720 ILCS 5/15-5, all of which accordingly constitute acts and threats involving extortion which are chargeable under State law and punishable by a term of imprisonment of more than one year as set forth in 18 U.S.C. § 1961(1). In addition, on or about the dates indicated in and as described in paragraph 44 above, Defendant Central Mfg., Defendant Stealth and Stoller, with an intent to extort money and other property from Plaintiff, sent and delivered



letters and other writings that expressly and impliedly threatened to inflict unlawful injuries to property in violation of California Penal Code §§ 519 and 523, which pursuant to California Penal Code §§ 520 and 523 constitute acts and threats involving extortion which are chargeable under State law and punishable by a term of imprisonment of more than one year as set forth in 18 U.S.C. § 1961(1).

(b) Mail Fraud: On or about the dates indicated in and as described in paragraphs 35 through 38 above, Defendant Central Mfg., Defendant Stealth and Stoller, having devised a scheme or artifice to defraud Plaintiff by false representations, did for the purpose of furthering and executing such scheme or artifice to defraud, transmit and cause to be transmitted by means of mail communications in interstate commerce, writing, signs, signals, pictures or sound, in violation of 18 U.S.C. § 1341 and 18 U.S.C. § 2.

(c) Wire Fraud: On or about the dates indicated in and as described in paragraphs 35 through 43 above, Defendant Central Mfg., Defendant Stealth and Stoller, having devised a scheme or artifice to defraud Plaintiff by false representations, did for the purpose of furthering and executing such scheme or artifice to defraud, transmit and cause to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, pictures or sound, in violation of 18 U.S.C. § 1343 and 18 U.S.C. § 2.

54. Defendant Central Mfg., Defendant Stealth and Stoller have executed within the past six years, and continue to execute, a pattern of racketeering activity within the meaning of 18 U.S.C. § 1961(1). The pattern of racketeering activity, as defined by 18 U.S.C. §§ 1961(1) and (5), presents both a history of unlawful conduct and a distinct threat of continuing unlawful activity in the future. Such activity consists of multiple acts of racketeering, is interrelated, not isolated, and is perpetrated for the same or similar purposes. Such activity extends over a substantial period of time, up to and beyond the date of this Complaint, and threatens to continue and to project itself into the future, including without limitation in that the predicate acts and offenses alleged herein have been part of an ongoing entity's regular way of doing business. Such activities occurred after the effective date of 18 U.S.C. §§ 1961 *et seq.*, and the last such act occurred within 10 years after the commission of a prior act of racketeering activity. Defendant Central Mfg., Defendant Stealth and Stoller have done so by performing the acts set forth above, including but not limited to the acts set forth in paragraphs 35 through 43 above, which constitute repeated violations of 18 U.S.C. § 1342 relating to wire fraud and 18 U.S.C. § 1341



relating to mail fraud, and the acts set forth in paragraph 44 above, which constitute repeated violations of State laws prohibiting extortion within the meaning of 18 U.S.C. § 1961(1).

55. The enterprise as described herein is at all relevant times a continuing enterprise because, among obvious reasons, it is designed to unlawfully extract and has damaged legitimate businesses including Plaintiff based upon fraudulent statements and threats of extortion as alleged herein.

56. As a direct and proximate result of the racketeering activity alleged herein, including by reason of the predicate acts constituting such pattern of racketeering activity by said Defendants, Plaintiff has suffered, and will in the future suffer, injury in its business or property.

57. Pursuant to 18 U.S.C. § 1964(c), Plaintiff is entitled to recover damages, to be trebled in accordance with statute, plus interest, costs and attorneys' fees, by reason of the pattern of racketeering activity and violations of 18 U.S.C. § 1962(c) alleged herein.

### **COUNT III**

(Unfair Competition -- Against All Defendants)

58. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 44 above, as though fully set forth at length.

59. Defendants are, and at all relevant times have been, perpetrating a scheme of fraudulently claiming trademark and other rights, including without limitation by means of false marketing materials, by the use and circulation of fraudulent letterhead and other documents, by threatening and filing sham legal proceedings and by other illegal means as described herein, for the purpose of extorting money and property from others, including Plaintiff.

60. Defendants' statements, misrepresentations, threats and conduct alleged herein were made not for the purpose of protecting or enforcing any legitimate, or even colorable, rights, but instead for the bad faith purpose of unlawfully extracting money from Plaintiff Google. Said statements, misrepresentations, threats and conduct by Defendants, made for such illegitimate reason, constitute unfair competition under the laws of this State and other jurisdictions.

61. Defendants' acts complained of herein have damaged and will in the future continue to damage Plaintiff Google irreparably. Plaintiff has no adequate remedy at law for these actual and threatened wrongs and injuries. The damage to Plaintiff includes harm to its

good will and reputation in the marketplace that money cannot compensate. Plaintiff is therefore entitled to injunctive relief restraining Defendants and their agents, servants, and employees, and all persons acting thereunder, in concert with them, or on their behalf, from further engaging in acts of unfair competition as against Plaintiff.

62. As consequence of the foregoing acts of unfair competition by Defendants, Plaintiff is also entitled to an award of its actual damages, together with its costs and attorney's fees, and to the disgorgement of Defendants' ill-gotten gains.

63. Defendants' acts were in bad faith, in conscious disregard of Plaintiff's rights and were performed with the intention of depriving Plaintiff of its rights. Accordingly, Defendants' conduct merits, and Plaintiff seeks, an award of punitive damages in an amount sufficient to punish Defendants and deter such conduct in the future.

#### **Prayer for Relief**

WHEREFORE, Plaintiff Google prays that this Court enter judgment as follows:

A. Enter an injunction prohibiting Defendants from engaging in further acts of false advertising, further acts of racketeering activity and further acts of unfair competition as to Plaintiff, pursuant to 15 U.S.C. § 1116, 18 U.S.C. § 1964(a) and state law;

B. Enter an order requiring the dissolution and/or reorganization of the enterprise and requiring the divestment of any interest, whether direct or indirect, therein, pursuant to 18 U.S.C. § 1964(a);

C. Award Plaintiff three times its damages and Defendants' profits, together with Plaintiff's reasonable attorney's fees and costs, pursuant to 15 U.S.C. § 1117 and state law;

D. Award Plaintiff treble damages and costs of suit, including reasonable attorneys' fees, pursuant to 15 U.S.C. § 1117 and 18 U.S.C. § 1964(c);

E. Award Plaintiff punitive damages in an amount sufficient to punish Defendants and deter such misconduct in the future;

F. Award Plaintiff prejudgment interest, as appropriate; and

G. Grant Plaintiff such other and further relief as this Court deems just and proper.

DATED: January 18, 2007

Respectfully submitted,

GOOGLE INC.

By: *Mima T. Zou*  
One of Its Attorneys

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**EXHIBIT LIST**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>
A	Cases Filed In Name of S Industries, Inc. in N.D. Ill. In 1996 and 1997
B	SI Registrations and Applications Purportedly Transferred to Defendant Central Mfg.
C	Defendants' April 12, 2006 request for an extension of time to oppose Application Serial No. 78192386
D	Sample of Defendants' Filings With Trademark Office
E	July 14, 2006 Order of U.S. Trademark Trial and Appeal Board ("TTAB")
F	Excerpts from Defendants' web site pages
G	Excerpts from Defendants' web site pages
H	Defendants' November 27, 2005 request for extension of time filed with TTAB
I	November 29, 2005 letter from Leo Stoller to Google Inc.
J	Mailing label for mail sent by Defendants to Google Inc.
K	April 10, 2006 fax from Defendants to Plaintiff
L	April 10, 2006 fax from Defendants to Plaintiff
M	Printout of relevant web pages from Defendants' rentmark.blogspot.com web site
N	July 14, 2006 TTAB dismissal order
O	March 31, 2006 e-mail to Leo Stoller to Google Inc.
P	Printout of relevant web pages from Defendants' rentmark.blogspot.com web site
Q	Printout of relevant web pages from Defendants' rentmark.blogspot.com web site
R	February 9, 2006 e-mail by Defendants to Plaintiff
S	March 2, 2006 e-mail by Defendants to Plaintiff

# **EXHIBIT A**

**Exhibit A****Cases Filed In Name of S Industries, Inc. in N.D. Ill. in 1996 and 1997**

1.	1:96-cv-01035	S Industries, Inc. v. Amer Soccer Co. Inc.	filed 02/23/96
2.	1:96-cv-01138	S Industries, Inc. v. Netti Export Corp., et al.	filed 02/27/96
3.	1:96-cv-01218	S Industries, Inc. v. Bard Wyers Sports, et al.	filed 03/01/96
4.	1:96-cv-01264	S Industries, Inc. v. HHA Sports, et al.	filed 03/04/96
5.	1:96-cv-01325	S Industries, Inc. v. ERO Ind Inc., et al.	filed 03/06/96
6.	1:96-cv-01776	S Industries, Inc. v. Fit Bearings, et al.	filed 03/27/96
7.	1:96-cv-02037	S Industries, Inc. v. World of Weapons, et al.	filed 04/08/96
8.	1:96-cv-02038	S Industries, Inc. v. Pelican Pro Inc., et al.	filed 04/08/96
9.	1:96-cv-02166	S Industries, Inc. v. Wonderwand, et al.	filed 04/12/96
10.	1:96-cv-02231	S Industries, Inc. v. Lane, et al.	filed 04/16/96
11.	1:96-cv-02232	S Industries, Inc. v. GMI Prof. Access Sys., et al.	filed 04/16/96
12.	1:96-cv-03389	S Industries, Inc. v. Diamond Multimedia, et al.	filed 06/05/96
13.	1:96-cv-03524	S Industries, Inc. v. Centra 2000 Inc., et al.	filed 06/11/96
14.	1:96-cv-03525	S Industries, Inc. v. NAAN Irrigation Sys., et al.	filed 06/11/96
15.	1:96-cv-03592	S Industries, Inc. v. Nat'l Baseball Hall	filed 06/13/96
16.	1:96-cv-03593	S Industries, Inc. v. Funline Mdse Co. Inc., et al.	filed 06/13/96
17.	1:96-cv-03916	S Industries, Inc. v. Kimberly-Clark Corp, et al.	filed 06/27/96
18.	1:96-cv-04140	S Industries, Inc. v. Ecolab Inc.	filed 07/09/96
19.	1:96-cv-04141	S Industries, Inc. v. Tru-Fit Mkg Corp.	filed 07/09/96
20.	1:96-cv-04149	S Industries, Inc v. Mitsubishi Int'l Inc., et al.	filed 07/09/96
21.	1:96-cv-04434	S Industries, Inc. v. Brodix Inc., et al.	filed 07/19/96

22.	1:96-cv-04659	S Industries, Inc. v. JL Audio Inc., et al.	filed 07/29/96
23.	1:96-cv-04951	S Industries, Inc. v. Stone Age Equip. Inc., et al.	filed 08/12/96
24.	1:96-cv-06047	S Industries, Inc. v. Tournament Grade, et al.	filed 09/19/96
25.	1:96-cv-06507	S Industries, Inc. v. Photostealth Fabric	filed 10/04/96
26.	1:96-cv-06509	S Industries, Inc. v. Hobbico Inc., et al.	filed 10/04/96
27.	1:96-cv-06538	S Industries, Inc. v. E-Force Sports, et al.	filed 10/07/96
28.	1:97-cv-01817	S Industries, Inc. v. Hobbico Inc., et al.	filed 03/17/97
29.	1:97-cv-02787	S Industries, Inc. v. Space-Age Tech, et al.	filed 04/21/97
30.	1:97-cv-03702	S Industries, Inc. v. Sunshine Golf	filed 05/20/97
31.	1:97-cv-03703	S Industries, Inc. v. Tour Advanced Int'l	filed 05/20/97
32.	1:97-cv-03704	S Industries, Inc. v. N GA Disc Golf	filed 05/20/97
33.	1:97-cv-03705	S Industries, Inc. v. S E Golf	filed 05/20/97
34.	1:97-cv-03706	S Industries, Inc. v. Proclub Golfing Co.	filed 05/20/97
35.	1:97-cv-03707	S Industries, Inc. v. M & M Golf Inc.	filed 05/20/97



# **EXHIBIT B**

**Exhibit B****SI Registrations and Applications Purportedly Transferred to Defendant Central Mfg.**

<b><u>Serial Number</u></b>	<b><u>Registration Number</u></b>	<b><u>Mark</u></b>
75016560	N/A	STEALTH
75242656	2137218	AIR FRAME
75242655	2138806	AIR FRAME
75230338	2137059	AIR FRAME
75228505	2128940	AIR FRAME
75228497	2138609	AIR FRAME
75228010	2140524	SENTRA
75218045	2110838	DARK STAR
75203742	2097863	FIRE POWER
75203741	2439735	STEALTH
75180414	2126933	STAR LITE
75154346	2077635	DARK STAR
75154345	2057613	DARK STAR
75154344	2061586	DARK STAR
75152224	2081565	DARK STAR
75143090	2273229	SENTRA
75130222	2083721	DARK STAR
75129214	2081347	DARK STAR
75129210	2071763	DARK STAR
75121252	2063283	STRADIVARIUS
75036382	3038587	STEALTH
75019143	2478742	STEALTH
75006422	2064576	SENTRA
75000280	2330467	STEALTH
74327774	N/A	STEALTH
74415569	1867087	STEALTH

74735868	2325054	STEALTH 9MM SHADOW
74735867	2325053	STEALTH 9MM
74734680	2523745	STEALTH
74726073	2551385	STEALTH
74724048	1984329	SENTRA
74724047	2025156	STEALTH
74630176	2024889	THE STEALTH
74476028	2657452	STEALTH
74063127	1766806	STEALTH
74004936	1717010	STEALTH
73778877	1615004	TERMINATOR
73793505	1608361	S
73778875	1623790	HAVOC
73771877	1621365	COLLIDER
73778748	1602482	ANNIHILATOR
73778747	1589092	24 KARAT
73771242	1593157	HYPERSONIC
73771241	1584851	AQUILLA
73767454	1581051	TRILLIUM
73772953	1596600	NIGHT STALKER
73771240	1564755	PHALANX
73768507	1564751	AEROSPACE
73621586	1450972	CHESTNUT
73553786	1438152	FIRE POWER
73554850	1424951	PLAY THE ANGLE
73552025	1389167	WHITE LINE FEVER
73552024	1384193	SENTRA
73552023	1382504	TIRADE
73551893	1381612	STRADIVARIUS

73496994	1332378	STEALTH
73481745	1326765	SENTRA
73478410	1361523	SENTRA
73399116	1323733	CREATIVE TRAVEL

# **EXHIBIT C**

Trademark Trial and Appeal Board Electronic Filing System. <http://esta.uspto.gov>

ESTTA Tracking number: **ESTTA76008**

Filing date: **04/12/2006**

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

Applicant: **V.P. Holding S.p.A.**  
Application Serial Number: **78192386**  
Application Filing Date: **12/09/2002**  
Mark: **VP VENTURES**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) VENTURE BRAND LICENSING to resolve this trademark controversy VENTURE v VP VENTURES and/or merely file an Express Abandonment! See [rentamark.com](http://rentamark.com), the nationally renowned trademark licensing and enforcement firm since 1974 for all of your VENTURE BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

# **EXHIBIT D**



Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA76007**

Filing date: **04/12/2006**

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

Applicant: **XELLA INTERNATIONAL GMBH**  
Application Serial Number: **78190546**  
Application Filing Date: **12/03/2002**  
Mark: **XELLA**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) ELLA BRAND LICENSING to resolve this trademark controversy ELLA v XELLA and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your ELLA BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA76009**

Filing date: **04/12/2006**

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

Applicant: **INFINGO, LLC**  
Application Serial Number: **78195155**  
Application Filing Date: **12/17/2002**  
Mark: **INFINGO**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) FINGO BRAND LICENSING to resolve this trademark controversy FINGO v INFINGO and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your FINGO BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA75758**

Filing date: **04/12/2006**

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

Applicant: **SKILLJAM TECHNOLOGIES CORPORATION**  
Application Serial Number: **76633965**  
Application Filing Date: **03/22/2005**  
Mark: **\$KILLJAM**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) SKILL BRAND LICENSING to resolve this trademark controversy SKILL v SKILLJAM and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your SKILL BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA72955**

Filing date: **03/27/2006**

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

Applicant: **MATTEL, INC.**  
Application Serial Number: **76641311**  
Application Filing Date: **06/21/2005**  
Mark: **MERMAIDIA**  
Date of Publication **02/28/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., P.O. Box 35189, Chicago, IL 60707-0189, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) MERMAID BRAND LICENSING to resolve this trademark controversy MERMAID v MERMAIDIA and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your MERMAID BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 03/30/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 06/28/2006.

Respectfully submitted,

/Leo Stoller/

03/27/2006

Leo Stoller

President

Stealth Industries, Inc.

P.O. Box 35189

Chicago, IL 60707-0189

UNITED STATES

ldms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://esta.uspto.gov>

ESTTA Tracking number: **ESTTA76011**

Filing date: **04/12/2006**

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

Applicant: **INDUSTRIAS ALEN, S.A. DE C.V.**  
Application Serial Number: **78201258**  
Application Filing Date: **01/08/2003**  
Mark: **DIAMOND**  
Date of Publication: **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) DIAMOND BRAND LICENSING to resolve this trademark controversy DIAMOND v DIAMOND and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your DIAMOND BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA76012**

Filing date: **04/12/2006**

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

Applicant: **Telstra Corporation Limited**  
Application Serial Number: **78206995**  
Application Filing Date: **01/24/2003**  
Mark: **TELSTRA**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) STRA BRAND LICENSING to resolve this trademark controversy STRA v TELSTRA and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your STRA BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA76013**

Filing date: **04/12/2006**

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

Applicant: **Lawn Tennis Association of Australia Limited**  
Application Serial Number: **78210957**  
Application Filing Date: **02/04/2003**  
Mark: **AUSTRALIAN OPEN TENNIS WORKOUT**  
Date of Publication: **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) WORKOUT BRAND LICENSING to resolve this trademark controversy WORKOUT v AUSTRALIAN OPEN TENNIS WORKOUT and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your WORKOUT BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,  
/Leo Stoller/  
04/12/2006  
**Leo Stoller**  
**President**  
**Stealth Industries, Inc.**  
**7115 W. North Ave., #272**  
**Oak Park, IL 60302**  
**UNITED STATES**  
**ldms4@hotmail.com**  
**773-589-0340**



Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA76025**

Filing date: **04/13/2006**

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

Applicant: **WebPower, Inc.**  
Application Serial Number: **78288158**  
Application Filing Date: **08/15/2003**  
Mark: **INTERNET FRIENDS NETWORK**  
Date of Publication: **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) FRIENDS NETWORK BRAND LICENSING to resolve this trademark controversy FRIENDS NETWORK v INTERNET FRIENDS NETWORK and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your FRIENDS NETWORK BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,  
/Leo Stoller/  
04/13/2006

**Leo Stoller**

**President**

**Stealth Industries, Inc.**

**7115 W. North Ave., #272**

**Oak Park, IL 60302**

**UNITED STATES**

**ldms4@hotmail.com**

**773-589-0340**

Trademark Trial and Appeal Board Electronic Filing System. <http://esta.uspto.gov>

ESTTA Tracking number: **ESTTA76018**

Filing date: **04/12/2006**

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

Applicant: **S.I.F.I. S.p.a.**  
Application Serial Number: **78242527**  
Application Filing Date: **04/27/2003**  
Mark: **SIFIMAV**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) SIFI BRAND LICENSING to resolve this trademark controversy SIFI v SIFIMAV and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your SIFI BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://esta.uspto.gov>

ESTTA Tracking number: **ESTTA76017**

Filing date: **04/12/2006**

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

Applicant: **PMC-Sierra, Inc.**  
Application Serial Number: **78240756**  
Application Filing Date: **04/22/2003**  
Mark: **PMC**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) PM BRAND LICENSING to resolve this trademark controversy PM v PMC and/or merely file an Express Abandonment! See [rentamark.com](http://rentamark.com), the nationally renowned trademark licensing and enforcement firm since 1974 for all of your PM BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,  
/Leo Stoller/  
04/12/2006

**Leo Stoller**

**President**

**Stealth Industries, Inc.**

**7115 W. North Ave., #272**

**Oak Park, IL 60302**

**UNITED STATES**

**ldms4@hotmail.com**

**773-589-0340**

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA76014**

Filing date: **04/12/2006**

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

Applicant: **JSR CORPORATION**  
Application Serial Number: **78224030**  
Application Filing Date: **03/11/2003**  
Mark: **NANOSTAR**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) NANO BRAND LICENSING to resolve this trademark controversy NANO v NANOSTAR and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your NANO BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA75999**

Filing date: **04/12/2006**

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

Applicant: **Young Shin Health Corp.**  
Application Serial Number: **76637477**  
Application Filing Date: **04/29/2005**  
Mark: **HAPPYWELL**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) HAPPY BRAND LICENSING to resolve this trademark controversy HAPPY v HAPPYWELL and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your HAPPY BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

**Leo Stoller**

**President**

**Stealth Industries, Inc.**

**7115 W. North Ave., #272**

**Oak Park, IL 60302**

**UNITED STATES**

**ldms4@hotmail.com**

**773-589-0340**

Trademark Trial and Appeal Board Electronic Filing System. <http://esta.uspto.gov>

ESTTA Tracking number: **ESTTA75936**

Filing date: **04/12/2006**

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

Applicant: **NINETY LONGVIEW, INC.**  
Application Serial Number: **76635950**  
Application Filing Date: **04/13/2005**  
Mark: **LAKO THE KITTEN**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) LAKE BRAND LICENSING to resolve this trademark controversy LAKE v LAKO THE KITTEN and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your LAKE BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/12/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

idms4@hotmail.com

773-589-0340

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA75752**

Filing date: **04/11/2006**

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

Applicant: **Renner Herrmann S/A**  
Application Serial Number: **76628432**  
Application Filing Date: **01/20/2005**  
Mark: **RENNER**  
Date of Publication **03/14/2006**

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Stealth Industries, Inc., 7115 W. North Ave., #272, Oak Park, IL 60302, UNITED STATES, a corporation organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- *Please contact (773-589-0915 FAX) RUNNER BRAND LICENSING to resolve this trademark controversy RUNNER v RENNER and/or merely file an Express Abandonment! See rentamark.com, the nationally renowned trademark licensing and enforcement firm since 1974 for all of your RUNNER BRAND LICENSING, trademark valuations, expert witness testimony and trademark litigation support services, ie., brief writing, trademark searches, legal research, appeals, etc.*

The time within which to file a notice of opposition is set to expire on 04/13/2006. Stealth Industries, Inc. respectfully requests that the time period within which to file an opposition be extended until 07/12/2006.

Respectfully submitted,

/Leo Stoller/

04/11/2006

Leo Stoller

President

Stealth Industries, Inc.

7115 W. North Ave., #272

Oak Park, IL 60302

UNITED STATES

ldms4@hotmail.com

773-589-0340

# **EXHIBIT E**



**UNITED STATES PATENT AND TRADEMARK  
OFFICE**  
Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

July 14, 2006

Leo Stoller  
7115 W. North Avenue #272  
Oak Park, Illinois 60302

Dear Mr. Stoller:

By order dated March 28, 2006, you were informed that the United States Patent and Trademark Office (USPTO) was considering imposing sanctions against you under 37 C.F.R. §10.18(c),<sup>1</sup> and you were allowed thirty days in which to show cause why sanctions should not be imposed. On April 26, 2006, after an extension of time to respond was granted, you filed your response to the order to show cause.

#### **BACKGROUND**

##### **Summary of the March 28, 2006 show cause order**

The show cause order noted that you and entities you control filed more than 1100 requests for extension of time to file notices of opposition between November 2005 and March 2006. The order noted, further, that the sheer number of such filings by one person is unprecedented and raises serious questions about whether the filings were undertaken for an improper purpose in violation of 37 C.F.R. § 10.18(b)(2), such as for harassment or unnecessary delay of the targeted applications.

The show cause order made reference to the numerous sanctions imposed on you, over many years, in past TTAB proceedings as evidence of your pattern of misconduct and abuse of the TTAB's

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<sup>1</sup> The authority to impose sanctions under 37 C.F.R. §10.18(c) has been delegated to the Chief Administrative Trademark Judge from the General Counsel under authority delegated to him by the Under Secretary of Commerce and Director of the United States Patent and Trademark Office.

processes.<sup>2</sup> The show cause order alluded also to your conduct in Federal court proceedings that resulted in negative comment, chastisement, and the imposition of sanctions. In light of your well-documented history, it was concluded that you most likely had an improper purpose in filing such an extraordinary number of extensions of time to oppose.

You were instructed specifically that your response to the show cause order include, for each of the marks for which you requested an extension of time to file an opposition, evidence

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<sup>2</sup> In particular, the following cases were cited in the show cause order: *S. Indus. v. Lamb-Weston, Inc.*, 45 USPQ2d 1293 (TTAB 1997) (submission of fraudulent certificate of mailing and certificate of service); *S Indus. v. S&W Sign Co.*, Opp. No. 91102907 (Dec. 16, 1999) (fraudulent allegations of ongoing settlement negotiations; allegations of non-receipt of papers found not credible); *Central Mfg. Inc. v. Third Millennium Technology, Inc.*, 61 USPQ2d 1210 (TTAB 2001) (submission of false statements in order to secure extension of time to oppose); *S Indus., Inc. v. Casablanca Indus., Inc.*, Canc. No. 92024330 (Oct. 3, 2000) (dilatory tactics throughout proceeding); *Central Mfg., Inc. v. Flex-Coil Ltd.*, Opp. No. 91117069 (Feb. 19, 2002) ("opposer's representative has filed ... numerous papers [for] the sole purpose of harassing applicant, apparently until it capitulates"); *Bacu USA Safety, Inc. v. Central Mfg. Co.*, Canc. No. 92032631 (Jul 24, 2003) ("respondent has ... failed to show cause why sanctions should not be imposed on it for filing the groundless Rule 11 motion, [and] has ... compounded its wrong by filing a groundless motion for reconsideration"); *S Indus. v. JL Audio, Inc.*, Opp. No. 91110672 (May 13, 2003) (finding opposers' claim "without exception, completely devoid of merit"; opposers engaged in "a pattern of voluminous and piece-meal motion practice against which [they] were warned"); *Central Mfg. Co. V. Astec Indus., Inc.*, Opp. No. 91116821 (Sept. 3, 2003) (judgment entered against opposer for filing abusive Rule 11 motions); *Central Mfg. Co. V. Medtronic Sofamor Danek, Inc.*, Opp. Nos. 91154585, 91154617 (Feb. 19, 2004) (sanctions imposed for filing meritless motions for the purpose of harassment and delay); *Central Mfg. Co. v. Premium Prods. Co.*, Opp. No. 91159950 (Sep. 29, 2004) (sanctions granted for opposer's bad faith omission of date from metered mail); *Leo Stoller v. Northern Telepresence Corp.*, Opp. No. 91162195 (Feb. 11, 2005) (Board found that opposer had submitted untimely extensions of time to oppose notwithstanding use of certificates of mailing and declarations to the contrary; opposition dismissed); *Bacu USA Safety, Inc. v. S Indus., Inc.*, Opp. No. 91108769 (Aug. 14, 2002) ("applicant's pattern of behavior ... reveals a deliberate strategy of delay, evasion and harassment ..., implied threats to the Commissioner, and ... a direct violation of a Board order").

that supports a claim that you may be damaged by registration of the mark.

Finally, you were informed that the sanctions being considered included terminating or vacating any extension of time to oppose found to have been filed in violation of the applicable rules, restriction of your right to appear before the USPTO on your own behalf or as an officer, director, or partner of any entity you control, and/or restriction of your right to request extensions of time to oppose on behalf of yourself or any entity you control.

#### **Summary of Response**

Your four-page response, to which you attached many pages of exhibits, consists of quotations from the show cause order, citation to certain cases to which you were a party and in which no sanctions were imposed on you, coupled with a request that the USPTO not impose any sanctions based on your past practices before the TTAB and other tribunals, and general comments concerning your basis for filing the numerous requests for extensions of time to oppose, without mention of any particular request.

#### **References to Other Proceedings**

In asking that the USPTO not sanction you for your past conduct in TTAB cases and the cases in other tribunals, you point out that the Executive Committee for the federal judicial district of the Northern District of Illinois issued you a citation on December 15, 2005, allowing you time to show cause why "reasonable and necessary restraints" should not be imposed upon you in view of your activities in the lawsuits brought by you or your wholly-owned companies, before the Court. The Executive Committee quoted Judge Coar in *Central Mfg. Co. v. Brett*,<sup>3</sup> 78 USPQ2d 1662, 1664 (N.D. Ill. 2005) as follows:

Indeed, as several judges (including this one) have previously noted, Stoller appears to be running an industry that produces often spurious, vexatious, and harassing federal litigation ... Plaintiff and one or more of his corporate entities have been involved in at least 49 cases

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<sup>3</sup> The Executive Committee referenced the case as: Case No. 04 C 3049, *Stealth Ind. Inc. v. George Brett & Brett*.

in this district alone. Of these, at least 47 purport to involve trademark infringement ... No court has ever found infringement in any trademark allegedly held by Stoller or his related companies in any reported opinion.

You also noted that, after filing your response, the Executive Committee ruled, without further explanation, as follows:

The Executive Committee of the Northern District of Illinois has considered your response to the citation issued to you on December 15, 2005. After discussion, the Committee will take no further action in this matter.

You then referred to an order in *Leo Stoller d/b/a Central Mfg. Co. v. WFJM Enterprises, Inc.*, Opposition No. 91155814 (TTAB May 5, 2004), in which the TTAB denied, as premature, a motion to impose sanctions on you.

Finally, in asking that the USPTO not sanction you for your past conduct, you refer to the "*S Industries v. Genie Door*"<sup>4</sup> case wherein the now Chief Judge of the Northern District of Illinois declined, eight years ago, to impose sanctions stating, in part, "the court, however, cannot base its decision to award fees on the plaintiff's conduct in other cases with other defendants."<sup>5</sup>

#### ***Comments Regarding Current Extension Requests***

You assert that none of the extensions that you have filed on your own behalf or on behalf of entities you control was made for any improper purpose or for harassment or delay. The show cause order specifically required you to provide, for each of the marks for which you have requested an extension of time to oppose, evidence supporting a claim that you may be damaged by registration of the mark. In response, you assert that you have met the standard for filing an extension of time to oppose, because all such extension requests "are not based upon the potential opposer being damaged by a registration, but are based upon the potential opposer merely having an opportunity to

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<sup>4</sup> The copy of the order provided with your response did not include the caption of the case. It appears that the correct designation of the case is *S Industries, Inc. v. GMI Holdings, Inc.*, Case No. 96 C 2232 (N.D. Ill. 1998).

<sup>5</sup> While the Court did not award fees to defendant (GMI), the Court did award costs to defendant.

investigate the facts, obtain documentation, and to enable the potential opposer to consider its position with regard to potential opposition of an application." You did not provide information regarding any specific steps you have taken with regard to any application for which you have obtained an extension of time to conduct such an investigation.

With respect to the requirement that you support your claim of damage, you state that, through entities which you control, you "hold rights to over 100 Federal Trademark Registrations" and hold "Common Law rights to several thousand trademarks and slogans which can be found at [www.rentamark.com](http://www.rentamark.com)." You submitted, as exhibits, excerpts from the referenced website, including a "list of emarks" to which you claim rights. You state that, for each extension filed, you relied on common law rights to a trademark that was, in your opinion, confusingly similar to the applicant's mark.<sup>6</sup>

In requesting that you not be sanctioned, you ask that the USPTO merely give you "... some direction to keep Leo Stoller on a proper course..."

#### **Activities Since Issuance of the Show Cause Order**

Since the date of the show cause order, you have filed requests for extension of time to oppose against more than 400 additional applications, bringing the total since November 2005 to over 1800, as compared to only six you filed in the five-month period between June and October 2005. In particular, USPTO records show that during the past year you have filed requests for extension of time to oppose as follows:

<b>June 2005</b>	<b>1</b>
<b>September 2005</b>	<b>3</b>
<b>October 2005</b>	<b>2</b>
<b>November 2005</b>	<b>47</b>
<b>December 2005</b>	<b>238</b>

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<sup>6</sup> "For each of the extensions that Leo Stoller filed, Leo Stoller held Common Law rights to a trademark that was in Leo Stoller's opinion, confusingly similar to the *potential opposer's* mark." (Emphasis added.) It is assumed that your reference to "potential opposer's mark" was intended, rather, as a reference to the marks against which you filed the extension requests.

January 2006	188
February 2006	151
March 2006	717
April 2006	423
May 2006	63
<b>Total</b>	<b>1,833</b>

In your response to the show cause order, you stated that you had ceased filing extensions of time to oppose in those cases in which you would have relied on your alleged common law rights. It appears that you have done so.

Since the issuance of the order to show cause, you have contacted directly at least some of the applicants whose applications are the subjects of your requests to extend time to oppose. The TTAB has received informal complaints, formal requests for reconsideration of certain, specific extension requests, and at least one objection to the granting of any more extension requests. The nature of your contact, according to the applicant for application Serial No. 76616350, was "a large package of materials requesting money" in exchange for settlement.<sup>7</sup> Apart from their substantive content, your contact letters request that the receiving applicant consent to an additional 90-day extension of time to oppose, further informing the addressee that such consent will be assumed if you do not hear from the applicant by a date certain and that you will file a "stipulated" request for an additional 90-day extension.<sup>8</sup>

#### APPLICABLE RULES

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<sup>7</sup> Contacting your potential adversary is not *per se* prohibited conduct. Indeed, many potential opposers do so in order to explore the possibility of initiating good faith, bilateral settlement discussion. Inasmuch as the substance of your contact is being addressed separately in connection with the requests being filed by the applicants who have taken formal steps to seek redress, the USPTO will not discuss in detail the "large package of materials" and other features of the contact letter.

<sup>8</sup> Under TTAB rules, you would not be permitted an additional 90-day extension after receiving a first 90-day extension. "After receiving one or two extensions of time totaling ninety days, a person may file one final request for an extension of time for an additional sixty days....No further extensions of time to file an opposition will be granted under any circumstances." Trademark Rule 2.102(c)(3); 37 C.F.R. §2.102(c)(3).

Trademark Rule 2.102 provides, in relevant part, for the filing of requests to extend the time to oppose as follows:

(a) Any person who believes that ... it would be damaged by the registration of a mark on the Principal Register may file ... a written request ... to extend the time for filing an opposition. ... Electronic signatures pursuant to § 2.193(c)(1)(iii) are required for electronically filed extension requests.

(c) ... Requests to extend the time for filing an opposition must be filed as follows:

(1) A person may file a first request for either a thirty-day extension of time, which will be granted upon request, or a ninety-day extension of time, which will be granted only for good cause shown.

Trademark Rule 2.193(c)(2) provides in relevant part as follows:

The presentation to the Office (whether by signing, filing, submitting, or later advocating) of any document by a party, whether a practitioner or non-practitioner, constitutes a certification under § 10.18(b) of this chapter. Violations of § 10.18(b)(2) of this chapter by a party, whether a practitioner or non-practitioner, may result in the imposition of sanctions under § 10.18(c) of this chapter.

Patent and Trademark Office Rule 10.18 provides as follows:

(b) By presenting to the Office (whether by signing, filing, submitting, or later advocating) any paper, the party presenting such paper, whether a practitioner or non-practitioner, is certifying that-

(2) To the best of the party's knowledge, information and belief, formed after an inquiry reasonable under the circumstances, that- (i) The paper is not being presented for any improper purpose, such as to harass someone or to cause unnecessary delay or needless increase in the cost of prosecution before the Office; (ii) The claims and other legal contentions therein are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal

of existing law or the establishment of new law; (iii) The allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and (iv) The denials of factual contentions are warranted on the evidence, or if specifically so identified, are reasonably based on a lack of information or belief.

(c) Violations of paragraph (b)(1) of this section by a practitioner or non-practitioner may jeopardize the validity of the application or document, or the validity or enforceability of any patent, trademark registration, or certificate resulting therefrom. Violations of any of paragraphs (b)(2)(i) through (iv) of this section are, after notice and reasonable opportunity to respond, subject to such sanctions as deemed appropriate by the Commissioner, or the Commissioner's designee, which may include, but are not limited to, any combination of-

- (1) Holding certain facts to have been established;
- (2) Returning papers;
- (3) Precluding a party from filing a paper, or presenting or contesting an issue;
- (4) Imposing a monetary sanction;
- ...
- (6) Terminating the proceedings in the Patent and Trademark Office.

#### DISCUSSION

Your assertion that you have met the standard for filing requests for extension of time to oppose and that you need not submit evidence supporting a claim that you may be damaged by registration of the marks in the subject applications amounts to a failure to respond meaningfully to the show cause order. While an unchallenged request for extension of time to oppose, when accompanied by a minimal statement of good cause, is rarely



denied,<sup>9</sup> your filing of more than 1100 requests for extension of time to oppose within the few months preceding the date of the show cause order suggested a serious violation of your responsibilities as a party before the USPTO. The show cause order thus required you to demonstrate more than what might have been required in the ordinary case to support a single request for extension of time. In particular, you were required to demonstrate that the extension requests were not filed for improper purposes but, instead, were based on cognizable rights you may have arising under the Trademark Act.

Addressing directly the issue of your belief that you will be damaged, you indicate that you own over 100 federal registrations for trademarks and that you have common law rights in several thousand trademarks and slogans, referring to your website and attaching pages from your website to your response. Your submissions do not substantiate your rights in any of the claimed marks, let alone support a colorable claim of damage. For example, you did not submit copies of the registration certificates of the registered trademarks you claim to own. Nor did you even clearly identify your registered trademarks and the goods and services for which they are registered.

In support of your claim of damage to your purported common law trademarks, you provided a listing of your claimed trademarks, running to almost 150 pages (50 terms listed on each page). The listing was derived from your website and includes nothing more than the listing of the marks themselves. You submitted no evidence of products or services bearing these alleged marks, no evidence that you have sold any products or services under these marks, and no evidence of your advertising of goods or services with these marks.

At your website, you offer to "RENT-A-FAMOUS slogan" and offer "Famous Trademarks for Rent On-Line." Your website states that you "control over 10,000 famous trademarks..." Nonetheless, the exhibits from your website do not demonstrate your offering for sale any goods or services, other than the "rental" of the marks themselves, nor do the website exhibits demonstrate the use of any of the asserted terms as trademarks. These excerpts from your website, rather than evidencing support of any purported claim for damage, reinforce the conclusion that you are holding up thousands of applications in an attempt to coerce applicants

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<sup>9</sup> But see, TBMP § 210, 211 (2d ed. rev. 2004) (regarding requests by applicants that the TTAB reconsider granted requests for extensions of time to oppose or deny subsequent requests).

to license, i.e., "rent," trademarks to which you have not demonstrated any proprietary right. Cf. *Central Mfg. Co. v. Brett*, 78 USPQ2d 1662, 1675 (N.D. Ill. 2005) ("Leo Stoller and his companies present paradigmatic examples of litigants in the business of bringing oppressive litigation designed to extract settlement.")

Finally, in requesting that the USPTO not sanction you for your past conduct, you reference in your response two court cases and a single TTAB case in which sanctions were not imposed on you. Although these other tribunals have for various reasons declined to impose sanctions, their decisions also contain findings supporting the conclusion that your recent activities in the TTAB are not isolated or anomalous, but rather reflect a pattern of harassing behavior. The rationales used by those other tribunals for declining to impose sanctions do not apply here, where the behavior is of such a systematic nature as to raise the potential cost of seeking a trademark for the public generally.

#### DETERMINATION

Your filing of an extraordinary number of requests for extension of time to oppose, particularly in light of your past behavior before the TTAB and the courts, constitutes a violation of your responsibilities under Patent and Trademark Rule 10.18(b). That rule provides that, by filing a paper (including the extension requests at issue here), you represent, among other things, that "[t]he paper is not being presented for any improper purpose, such as to harass someone or to cause unnecessary delay or needless increase in the cost of prosecution before the Office" and that "[t]he claims and other legal contentions therein are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law." Patent and Trademark Rule 10.18(b)(2).

Extensions of time to oppose are granted *ex parte*, typically upon a minimal showing of good cause. Nonetheless, the requirements for an extension of time to oppose are clear: "Any person who believes that he, she or it would be damaged by the registration of a mark ... may file in the Office a written request ... to extend the time for filing an opposition." Trademark Rule 2.102(a) (emphasis added). Thus, while the potential opposer's showing

need not be extensive and the TTAB's examination of extension requests is usually cursory, Trademark Rule 2.102 and Patent and Trademark Rule 10.18 require that all requests for extension of time be based on a good faith belief that the potential opposer would be damaged by the potential registration.

The show cause order invited you to demonstrate that your filing of each of the extraordinary number of requests for extension of time to oppose was not improper. ("Any such showing should include evidence that supports a claim that you may be damaged by the registration of each of the marks for which an extension of time to oppose has been filed.") While extensions of time to investigate potential claims are common, the potential opposer must still hold some reasonable belief that it would be damaged by registration of the mark in question. Notwithstanding the opportunity offered to you to demonstrate such a belief, you have declined to make any such showing.

Any impropriety with respect to the letters you have sent to applicants against whose applications you have filed requests to extend time to oppose is not now under review. Nonetheless, the manner in which you request "consent" for prospective further requests to extend time to oppose, such consent being necessary under Trademark Rule 2.102(c)(3), is indicative of your motivation in filing the requests to extend time to oppose that are now under scrutiny. Specifically, your intimation that the individual applicant's consent is presumed if you do not receive an objection is in contradiction of your actual knowledge that any such consent must be explicit. See *Central Manufacturing, Inc. v. Third Millennium Technology, Inc.*, 61 USPQ2d 1210 (TTAB 2001) (misrepresenting that applicant has "agreed" to the third and fourth requests to extend time to oppose). Thus, your contact letters, providing misinformation as to the requirements for the final extension request permitted under Trademark Rule 2.102(c)(3), support the finding that the extension requests at issue here were filed for improper purposes, specifically "...to obtain additional time to harass applicant, to obtain unwarranted extensions of the opposition period, and to waste resources of applicant and the Board." *Id.* at 1216.

In view thereof, it is determined that you have not made a showing that you have a colorable claim of damage justifying the extension requests filed during the period in question and have failed to establish good cause for filing such requests. It is determined, further, that you filed the extension requests for improper purposes, namely, to harass the applicants to pay you to

avoid litigation or to license one of the marks in which you assert a baseless claim of rights. Your misuse of the TTAB's procedures dictates that the USPTO impose on you an appropriate sanction.

### **Sanctions Imposed**

In deciding what sanctions to impose, the USPTO considered the egregious nature and extent of your recent misconduct, including the impact of the misconduct on TTAB proceedings. You have been granted 90-day extensions of time to oppose more than 1800 applications. The effect has been to delay by at least three months the issuance of trademark registrations for each of those applications. In addition, the TTAB has had to divert significant resources to answering telephone inquiries from applicants or their representatives concerning your numerous filings. And the applicants against whom you have filed requests for extension of time to oppose have begun to submit formal objections that the TTAB must decide.

Also, the USPTO found it reasonable and proper to consider your recent misconduct in the context of your well-documented pattern of misconduct during many years of litigation before the TTAB and the courts as set out in the show cause order, which included the sampling of TTAB cases in which sanctions were imposed against you<sup>10</sup> and the case in the Northern District of Illinois.<sup>11</sup> Cf. C.

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<sup>10</sup> Indeed, irregularities with respect to your filing of requests to extend time to oppose have been considered previously. See, for example, *Stoller v. Northern Telepresence Corp.*, 152 Fed. Appx. 923, 2005 WL 2813750 (Fed. Cir. 2005), affirming the TTAB's decision denying as untimely your request(s). See also *Central Manufacturing, Inc. v. Third Millennium Technology, Inc.*, 61 USPQ2d 1210 (TTAB 2001), imposing a sanction, for a period of one year, which required the actual signature of the adverse party for any request to extend time to oppose filed by you in which it was alleged that such request was being sought on consent, or had been agreed to, or in which there was any allegation of any type of settlement discussion. This sanction was imposed because the TTAB found that the applicant had not "agreed" to the extension requests, that the parties were not engaged in bilateral settlement discussions, and that applicant had not invited opposer to proffer a settlement agreement, all determinations being contrary to your proffered reasons for seeking the extensions at issue therein. The TTAB further found that you "filed papers based on false statements and material misrepresentations and, moreover, ... engaged in a pattern of submitting such filings to this Board."

Wright & A. Miller, 5A Fed. Prac. & Pro. Civ.3d § 1336.1 (2006) (appropriate to consider prior behavior in other cases when exercising a court's inherent authority); Fed. R. Civ. P. 11, Advisory Committee's Note (1993) (same consideration appropriate under Rule 11). While the USPTO has considered findings made by other tribunals, the pattern of activities in the TTAB alone justify the sanctions imposed below.

The following sanctions are, therefore, hereby imposed:

**Grant of Extension Requests Vacated**

The approval of each request for extension of time to oppose that you have filed since November 2005 is hereby vacated.<sup>12</sup>

**Two-Year Prohibition On Filing Extension Requests**

You are hereby prohibited for a period of TWO YEARS from the date of this order from filing, on your own behalf or as an officer, director, or partner of any entity you control, any request for extension of time to oppose under Trademark Rule 2.102. This two-year prohibition applies whether or not you are represented by an attorney.

**Requirement Of Attorney Representation For Any Future Extension Requests**

You are PERMANENTLY prohibited from appearing before the USPTO on your own behalf or as an officer, director, or partner of any

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<sup>11</sup> In contrast to the two cited orders of the Northern District of Illinois in which the Executive Committee and the Court declined to impose sanctions, that court has chastised and sanctioned you numerous times. See, e.g., *S Industries, Inc. v. JL Audio, Inc.*, 29 F. Supp.2d 878 (N.D. Ill. 1998) ("This has not been a good year for Plaintiff in the Northern District of Illinois, but, then again, Plaintiff has not been a good litigant."), referencing several other cases before the Court that had been decided against you. See also *Central Mfg. Co. v. Pure Fishing, Inc.*, 2005 WL 3090998 (N.D. Ill. 2005) (and cases cited therein), in which the court imposed the sanction of dismissing plaintiff's claim and granting defendant's counterclaims to cancel registrations you own and for declaratory and injunctive relief. (The *Pure Fishing* case is suspended pending resolution of your petition in bankruptcy.)

<sup>12</sup> Extension requests granted more than 90 days ago have now expired. This sanction is, thus, moot with respect to such requests. But, if you have filed a notice of opposition against any of the involved marks, such notice of opposition is rendered untimely by this sanction, and any such opposition shall be dismissed.

entity you control for the purpose of filing any request to extend time to file a notice of opposition or any paper associated therewith. Any such future request must be filed by an attorney, who will be bound to act in accordance with USPTO Rule 10.18(b).

#### **Request For "Direction"**

Finally, you requested "direction" in how to proceed before the TTAB. As a frequent party to proceedings before the TTAB during the past ten years, you have been informed repeatedly about how the TTAB expects proceedings to be conducted. In the past, you have often ignored the direction given you by the TTAB, in the form of information or reprimand, or have found a way to side step such direction with improper or bad faith conduct.

The USPTO provides information to parties and the public electronically in a user-friendly format. The Trademark Act, the rules of practice in matters before the TTAB, The Trademark Trial and Appeal Board Manual of Procedure (2d ed. rev. 2004), and answers to frequently asked questions are all available for viewing and downloading at [www.uspto.gov](http://www.uspto.gov). While an individual may represent himself or herself (or a business in which he or she is an officer or partner) before the USPTO, see Patent and Trademark Rule 10.14(e), the TTAB "strongly recommend[s]" that a party be represented by an "attorney familiar with trademark law." TBMP §114.01 (2d ed. rev. 2004). Those who choose to represent themselves occasionally call the TTAB with questions and are provided procedural information. Overall, after being directed to the TBMP, they abide by the rules. Thus, there is no reason for the USPTO to conclude that the explanations provided in the TBMP are too complicated for pro se litigants, particularly for ones with an extensive history of practice before the TTAB.

Consequently, the TTAB's "direction" to you will remain the same that it has been for many years and the same as that given to other litigants representing themselves: engage an experienced trademark lawyer. Failing that, read and follow the applicable statute, rules, and cases and consult the TBMP for guidance.

#### **Potential for Imposition of Broader Sanctions**

The applicable rules permit broader sanctions. For instance, the USPTO considered whether to bar you permanently from filing

extension requests or to require that you be represented by an attorney with respect to any future Board matter, not just requests for extensions of time to oppose. At this time, the USPTO has restricted the sanctions imposed herein to those closely related to your recent misconduct and, it believes, the minimum necessary to prevent such misconduct in the future. Nonetheless, the question of broader sanctions will be revisited if you commit further improprieties in proceedings before the TTAB.

So ordered.

/signed/

J. David Sams  
Chief Administrative Trademark Judge  
Trademark Trial and Appeal Board  
United States Patent and Trademark Office

# **EXHIBIT F**





# STEALTH MAIL Great Selection Great Prices!

RENTAMARK.COM is an independent, full service, international licensing and merchandising agency. RENTAMARK.COM owns and controls over 10,000 famous trademarks specializing in the trademark licensing business.

With over 25 years of experience in licensing, manufacturing, product placement and promotion, RENTAMARK.COM has expertise in handling all aspects of your trademark licensing and merchandising.

RENTAMARK.COM is able to license to your company one of the following famous trademarks that will allow your business to sell its products and services worldwide.

To view graphic image versions of our e-marks, please click on the Sample Catalog button in the control panel. Below we have listed e-marks in word form:

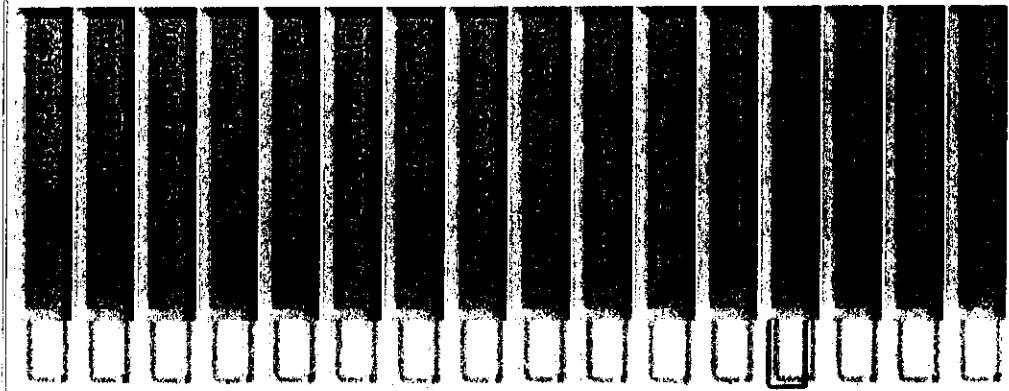
WordMarks A-D

WordMarks E-I

WordMarks J-O

WordMarks P-S

WordMarks T-Z





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# **EXHIBIT G**



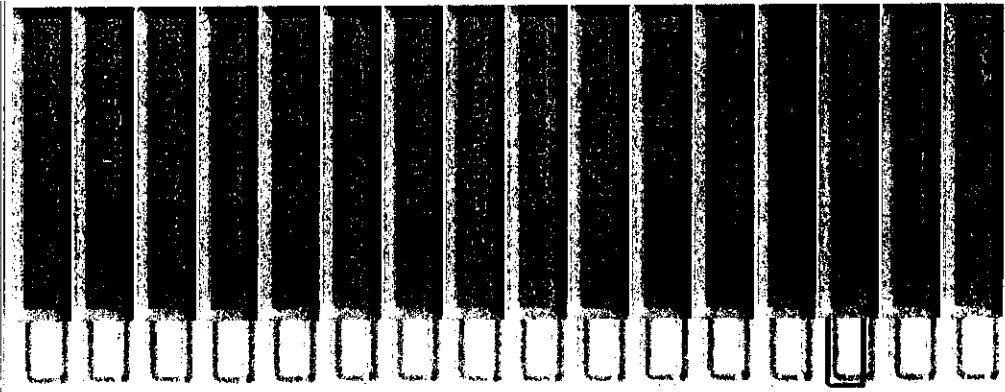
RENTAMARK.COM is an independent, full service international licensing and merchandising agency. RENTAMARK.COM owns and controls many famous trademarks specializing in the trademark licensing business.

With over 25 years of experience in licensing, manufacturing, product placement and promotion, RENTAMARK.COM has expertise in handling all aspects of your trademark licensing and merchandising.

RENTAMARK.COM is able to license your company with any one of our famous trademarks that will allow your business to sell its products and services worldwide. Below are our Licensed Word Marks. To view our e-Marks, simply click on the button in the control panel.

Below are our Licensed Word Mark's. To View our e-Mark's, simply click on the button in the control panel.

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AFICIONADOS  
AFTERGLOW  
AFTERSHOCK  
AGENT A

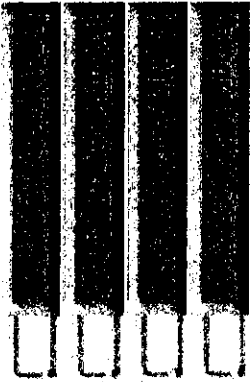


ALLURING  
AMAZON  
ANTEATER

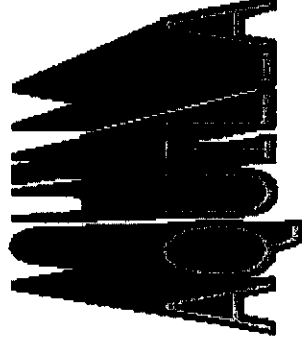
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ARMOR  
ATTRACTIONS  
AUDACIOUS  
BACKPACKING  
BACKSTAGE

BOARDROOM  
BOOKMARK  
BOOKSHELF  
BOOMTOWN  
BOOTCAMP  
BOOTLEGGER  
BRAINTEASERS  
BREAKTHROUGH

BREATHTAKING  
BRILLIANT  
BUCKLE-UP  
BUG-A-BOO



BUSTED  
CAMPFIRE  
CANDLESTICK  
CAPPUCCINO  
CAPTIVATED  
CENSORED  
CENTURION  
CHATEA



CHECKPOINT  
CHICANERY  
CHOREOGRAPHER  
CHUTZPAH  
CLEAVAGE  
.COM  
CLOUT  
CONCIERGE  
CONFIGURE  
CONG RATS

CONQUISTADOR  
CONTENTS  
CONVOY



CORDLESS  
CORRECTION  
CREATOR  
CULPRIT  
CYBERLITE

# ELIMINATOR

CYBERFORCE  
CYBERSCOPE  
CYBERSPACE  
DANCE WEAR  
DASHBOARD  
DATELESS



DAUNTING  
DAZZLING  
DEADPAN  
DEBRIEFING



DERECOGNITION  
DESIRE  
DISCREET  
DOPPLER  
DOWNHILL

DOWNLOAD  
DROUGHT



EBUSINESS  
ELIGIBLE  
ELUSIVE  
ENCHANTRESS  
ENCORE  
ENGULFED  
ENIGMA  
ENTICEMENT  
ENTREPRENEUR  
EXHILARATING  
EXIT



EXTRATERRESTRIAL  
EXUBERANCE  
FAN DANGO  
FANTASIES  
FETISH  
FIREWORKS

FLASHBACK  
FLAUNT



FLAWLESS  
FLIRT  
FLYBOY  
FORMULA  
FORUM  
FOURSOME  
FRAY  
FRESHWATER



GAMEROOM  
GEARHEAD  
GIGOLO  
GODDESS  
GRAPEVINE  
GROUNDBREAKING



HACKER  
HAN DHELD  
HARDBALL  
HARDCORE  
**Havoc**  
HEADSTRONG

HEINOUS  
HIDEOUT  
HITCHHIKING



HOAX  
HOMECOMING  
HONORS  
HYSTERIA  
IMPACT  
INDOMITABLE



INGENIOUS  
INSTINCT  
INTERACTIVE  
INTERGALACTIC  
INTIMACY  
IRRESISTIBLE



JUMPSTART  
KEYBOARD  
KISSABLE

KNUCKLES

**[REDACTED]**

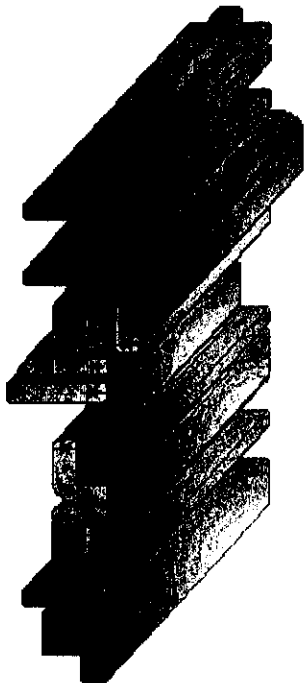
LANDMARK  
LANDSCAPE  
LAUNCHPAD  
LEATHER FACE  
LEG WEAR  
LIBATION  
LIFEJACKET  
LOCKER ROOM  
LUSCIOUS

**[REDACTED]**

MACHO  
MAKEOVER  
MANTRACK  
MARKETPLACE  
MASTERPIECE  
MATCHMAKER  
MATCHUP  
MAYDAY  
MELTDOWN

**[REDACTED]**

MEMORABILIA  
MESMERIZING  
MICROGRAVITY  
MONOGAMOUS



NECTAR  
NETWORKABLE  
NEVER  
NEWS  
NEWSWORTHY  
NONCONFORMIST  
NUANCE  
NUANCES



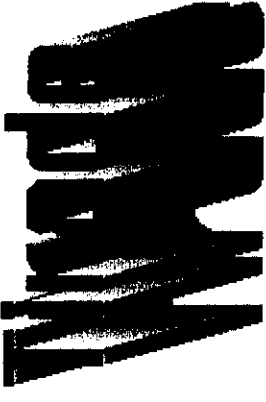
ONLINE  
OSCARPADES  
OUTPOST  
PAMPERING  
PARADOX  
PAYCHECK

**SENTRA**

PEDIGREE  
PERFECT  
PERISCOPE  
PIRANHA  
PITFAEL  
PEYBOOK  
PLAYMOBILE  
POKER  
POSTCARD  
PREY  
PROVOCATIVE  
PUMP

**wordmarks**

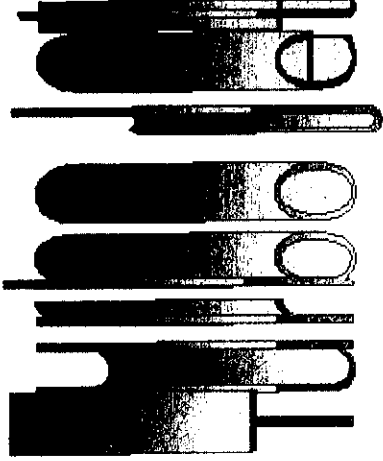
QUANDARY  
QUOTABLE  
RAIN FOREST  
RAUNCH  
RECON  
REDEMPTION  
RELAX  
REMARKABLE  
REVENGE  
RIVERBOAT



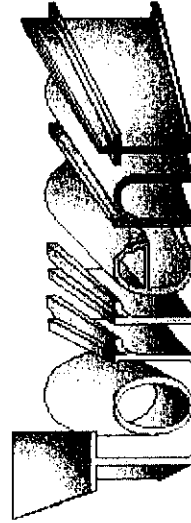
RJ V E R W A L K  
R O A R  
R O O T L E S S  
R O U N D U P  
R U L E  
R U N A W A Y



S A H A R A  
S A L T W A T E R  
S C A N D A L  
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S C O R C H  
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S E A T P O S T  
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S H A K E D O W N  
S H I P S H A P E  
S H I P W R E C K  
S H M O O Z E  
S I D E S H O W



SINFUL  
SINGLEWORLD  
SIZZLE  
SMART  
SMARTRAK  
SMILE  
SMITTEN  
SNAFUS  
SNOOKUMS  
SOLUTIONS  
SONGWRITER  
SPARKLE



SPLASH  
SPOKESMAN  
SPOTLIGHT  
STARDOM  
STARTUP

STATUESQUE  
STEAMY  
STORYTELLER  
STORYTELLING  
SUBMISSION  
SUBTERFUGE  
SULTRY  
SUMMERTIME  
SUREFIRE  
SURETRADE  
SUREFOOTED  
SURRENDER  
SWEETHEART  
SYNERGY



TAKEDOWN  
TASTEFUL  
TEASE  
TECHNOLOGY  
THREESOME

UNRIVALED  
UPSIZING  
UNSURPASSED  
UNZIPPED

VACATIONLAND  
VERDICT  
VOODOO





WALK  
WANNABE  
WARNING  
WARRIOR  
WATERWAY  
WEEKEND  
WHIPLASH  
WILDLIFE  
WINGSPAN  
WISEASS  
WITCHCRAFT  
WOODSHOCK  
WOW



YIKES  
YOULOGON  
YUCKATION

ZESTY



Webmaster

# **EXHIBIT H**

*Trademark Trial and Appeal Board Electronic Filing System. <http://esta.uspto.gov>*

ESTTA Tracking number: **ESTTA55062**

Filing date: **11/27/2005**

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

Applicant:	<b>GOOGLE INC.</b>
Application Serial Number:	<b>76314811</b>
Application Filing Date:	<b>09/18/2001</b>
Mark:	<b>GOOGLE</b>
Date of Publication	<b>11/01/2005</b>

**First 90 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, Central Mfg. Co. (Inc), P.O. Box 35189, Chicago, IL60707-0189, UNITED STATES, a Corporation, organized under the laws of Delaware, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown .

Potential opposer believes that good cause is established for this request by:

- The potential opposer needs additional time to investigate the claim

The time within which to file a notice of opposition is set to expire on 12/01/2005. Central Mfg. Co. (Inc) respectfully requests that the time period within which to file an opposition be extended until 03/01/2006.

Respectfully submitted,  
/Leo Stoller/  
11/27/2005

**Leo Stoller**

**President/CEO**

**Central Mfg. Co. (Inc)**

**P.O. Box 35189**

**Chicago, IL60707-0189**

**UNITED STATES**

**ldms4@hotmail.com**

**ldms4@hotmail.com**

# **EXHIBIT I**

**GOOGLE**

---

GOOGLE BRAND PRODUCTS & SERVICES SINCE 1981  
P.O. Box 35189, Chicago, IL 60707-0189  
VOICE 773/283-3880 \* FAX 708/453-0083 \* WEB PAGE: www.rentamark.com

November 29, 2005

Julia Anne Matheson  
ROSE HAGAN  
Google, Inc.  
Building 41  
1600 Amphitheatre Parkway  
Mountain View, CA 94043

Re: **FOR SETTLEMENT PURPOSES ONLY -- NOT DISCOVERABLE.**  
**GOOGLE**  
**APP. S/N: 76-314,811**

Dear Ms. Matheson:

We are serving notice on you that we have filed a request for an extension of time to oppose your client's pending trademark application SN: 76-314,811.

We hold common law rights have been using the similar mark **GOOGLE** for many years prior to your clients use of the said mark and we engage in an active, aggressive trademark licensing program. We thus invite your client to become a trademark licensee of ours.

We have standing pursuant to **37 CFR §2.101(b)** to oppose your client's said trademark application and to conduct extensive discovery into your clients books and records, including depositions under oath of your client's executive officers.

**THE BOARD PROVIDES A PERIOD OF TIME FOR PARTIES TO SETTLE**

The Board encourages parties to settle registerability issues prior to filing of a Notice of Opposition. district Courts through out the land encourage parties to settle complex trademark litigation without getting into the actual merits of the claims, on the grounds that parties can will never settle a controversy outside of a court decision if the parties insist that their claims have to settled on the merits. In the case at bar, it will cost the parties at a minimum in excess of **\$150,000.00 (one hundred and fifty thousand dollars an no/100)** in fees and costs, and five years, to litigate this matter through to the Federal Circuit, without any party receiving a guaranteed positive result, not withstanding the merits of either parties claims. In view of the above the Board strongly encourage parties to settle register ability issues as between themselves rather than by TTAB decision. That is why the potential opposer is attempting to reach out to the Applicant in the extension period allowed by the Board to achieve an amicable settlement as between the parties.

It should be noted for the record that the potential opposer in this case has engaged in more oppositions and petitions to cancel over the last 30 years than any other entity currently practicing before the TTAB (over 300).

As well known to the Applicant, an Opposer in any opposition proceeding has the clear distinct procedural advantage in that there is an automatic "cloud" placed over the Applicant's title to its mark, which will not evaporate until the final court, the Federal Circuit speaks. After 4 or 5 new management, which loses interest in the said Application. In addition, the Applicant will not normally invest much of its time and funds promoting a mark which has a dark "cloud" over it. Consequently, an this Applicant would be well advised to merely file an express abandonment of the said application rather than continue to invest in an trademark application that may never register. That is what we encourage the applicant in this case to do. No money has to exchange hands, if the Applicant chooses to file a express abandonment with prejudice of its said application at issue within ten days.

**This is an easy case to settle today.**

Prior to our filing the Notice of Opposition, the potential opposer i s placing on the table three reasonable settlement proposals, that when accepted by your client, will amicably resolve the registerability controversy. Number one is a Covenant Not To Sue where in your client agrees to abandon its trademark Application. The second is a 5% royalty based trademark licensing which will allow your client to use the said mark under license. The third agreement is a Consent To Register Agreement. Any of the said settlement agreements will avoid the need of a long and costly opposition proceeding and will allow the parties to resolve the said controversy registerability controversy amicably.

It should be noted that the potential opposer will not require the applicant, nor should be applicant require the potential Opposer to engage in any pretrial discovery whatsoever, as it has never been proven beneficial to resolving a registerably issue outside of a TTAB decision. The potential opposer will not participate in any pretrial discovery. If the Applicant is interested in settling this matter prior to the filing of a Notice of Opposition, the Opposer has given the Applicant three very easy methods upon which this case can be quickly settled.

The settlement offer(s) are valid until **December 20, 2005**.

If you have any questions please feel free to call me at 773-589-0340.

Most cordially,



Leo Stoller  
GOOGLE  
P O Box 35189  
Chicago, IL 60707  
Tel: 773/283-3880  
FAX: 708/453-0083



**AGREEMENT TO DISCONTINUE USE**  
**(Covenant Not To Sue)**

**AGREEMENT**, is made and entered into as of this 27<sup>th</sup> day of NOV, 2005, by and between **RENTAMARK.COM**, P O Box 35189, Chicago, Illinois 60707-0189 (hereinafter referred to as "GOOGLE "), and **GOOGLE INC., CORPORATION DELAWARE; 1600 Amphitheatre Parkway; Building 41; Mountain View, CA 94043** (hereinafter referred to as "GOOGLE INC. ").

WHEREAS, GOOGLE and GOOGLE INC. desire to settle this dispute and future disputes regarding GOOGLE INC.'S use of the mark **GOOGLE**.

NOW, THEREFORE, in consideration of the mutual covenants set forth herein, the parties agree to as follows:

1. GOOGLE agrees not to sue GOOGLE INC. for any unauthorized use of selling GOOGLE brand goods in the **past and/or present use** of the trademark **GOOGLE**.
- 1.1 GOOGLE INC. agrees to discontinue all use of the mark **GOOGLE** and any mark confusingly similar to the mark **GOOGLE** in the opinion of GOOGLE , **by April 29, 2007**.
2. The parties agree that this Agreement constitutes the entire agreement and understanding between the parties related to the subject matter hereof, superseding all previous communications, and that this Agreement can only be modified in writing signed by both parties.
3. GOOGLE INC. acknowledges GOOGLE's exclusive ownership of the mark **GOOGLE** and agrees not to oppose GOOGLE's applications or GOOGLE's use of its **GOOGLE** mark(s).
4. This Agreement shall be valid worldwide.
5. This agreement inures to the benefit of, and is binding upon, GOOGLE and GOOGLE INC., their parents, subsidiaries, sister companies, affiliates, entities which control the foregoing, entities which the foregoing control, and all of their successors and assigns.
6. The parties agree that this agreement will be maintained confidential.
7. This agreement becomes null and void on **December 20, 2005** if GOOGLE has not receive an executed copy from GOOGLE INC.
8. GOOGLE and GOOGLE INC. have caused this Agreement to be executed by their duly authorized legal representatives.

**ACCEPTED AND AGREED:**

GOOGLE

LEO STOWER

Representative of GOOGLE

Date: NOV 27 05

LEO STOWER

Signing Representative of GOOGLE

[PRINTED]

Date: NOV 27 05

C:\MARKS44\GOOGLE.TRO

GOOGLE INC.

\_\_\_\_\_  
Representative of:  
GOOGLE INC.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signing Representative of:  
GOOGLE INC.

[PRINTED]

Date: \_\_\_\_\_

**SETTLEMENT AGREEMENT**  
**(Consent to Register Application No. 76-362,450)**

This Agreement, effective NOV 29, 2005, is by and between RENTAMARK.COM, P.O. Box 35189, Chicago, Illinois 60707-0189 (hereinafter referred to as "GOOGLE") and GOOGLE INC., CORPORATION DELAWARE; 1600 Amphitheatre Parkway; Building 41; Mountain View, CA 94043 (hereinafter referred to as "GOOGLE INC. ").

WHEREAS, GOOGLE INC. has filed First Use Application Serial No(s). 76-314,811 Int. Cl. No(s). 11, 12, 16, 18, 21, 25, 28, 35, 38 and 42, for **See attachment**.

WHEREAS, GOOGLE and GOOGLE INC. desire to settle this dispute and future disputes regarding GOOGLE INC.'s use of the mark **GOOGLE** as set forth in the trademark application 76-314,811.

WHEREAS, the parties desire to avoid the cost, expense and delay of litigation by amicably adjusting, compromising and settling any dispute, subject to the terms and conditions of this AGREEMENT.

NOW THEREFORE, in consideration **\$100,000.00 (one hundred thousand dollars and no/100 cents)** paid to RENTAMARK.COM by GOOGLE INC., for the foregoing promises, and the following mutual understandings, it is agreed as follows:

1. GOOGLE INC. agrees to limit its use of the mark **GOOGLE** to the goods identified in its Application Serial No. 76-314,811.
  - 1.1 GOOGLE INC. agrees not to file for any other Trademark application containing the word **GOOGLE**.
2. GOOGLE shall not object to GOOGLE INC.'s use or registration of its mark **GOOGLE** listed in Application Serial No. 76-314,811.
3. GOOGLE agrees not to sue GOOGLE INC. for any **past, or present or future use** of the trademark identified in Application Serial No. 76-314,811.
4. GOOGLE INC. acknowledges GOOGLE's exclusive ownership of the mark **GOOGLE** and agrees not to oppose GOOGLE's applications or **GOOGLE** marks and agrees not to sue **GOOGLE** for use of its **GOOGLE** mark(s).
5. This Agreement shall be valid worldwide.
6. This agreement inures to the benefit of, and is binding upon, **GOOGLE** and **GOOGLE INC.**, their parents, subsidiaries, sister companies, affiliates, entities which control the foregoing, entities which the foregoing control, and all of their successors and assigns.

7. Neither party shall disclose the terms or conditions of this Agreement to any third party, nor issue any public statements relating to this Agreement without the written consent of the other party, unless such disclosure or statement is reasonably believed by the party to be compelled by governmental authority. A disclosing party shall furnish reasonable prior notice to the other party before making the statement or disclosure.

8. GOOGLE and GOOGLE INC. have caused this Agreement to be executed by their duly authorized legal representatives.

9. This Agreement can be executed in counterparts. If Rentamark.com, does not receive a signed copy by December 20, 2005 this agreement is null and void.

Rentamark.com

GOOGLE INC.

By   
Representative of GOOGLE

By \_\_\_\_\_  
Representative of:  
GOOGLE INC.

Dated: 11.19.05

Dated: \_\_\_\_\_

**GOOGLE**

---

GOOGLE BRAND PRODUCTS & SERVICES SINCE 1981  
P.O. Box 35189, Chicago, IL 60707-0189  
VOICE 773/283-3880 \* FAX 708/453-0083 \* WEB PAGE: www.rentamark.com

November 29, 2005

Julia Anne Matheson  
ROSE HAGAN  
Google, Inc.  
Building 41  
1600 Amphitheatre Parkway  
Mountain View, CA 94043

Re: **FOR SETTLEMENT PURPOSES ONLY -- NOT DISCOVERABLE.**  
**GOOGLE**  
**APP. S/N: 76-314,811**

Dear Ms. Matheson:

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We have standing pursuant to **37 CFR §2.101(b)** to oppose your client's said trademark application and to conduct extensive discovery into your clients books and records, including depositions under oath of your client's executive officers.

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As well known to the Applicant, an Opposer in any opposition proceeding has the clear distinct procedural advantage in that there is an automatic "cloud" placed over the Applicant's title to its mark, which will not evaporate until the final court, the Federal Circuit speaks. After 4 or 5 new management, which loses interest in the said Application. In addition, the Applicant will not normally invest much of its time and funds promoting a mark which has a dark "cloud" over it. Consequently, an this Applicant would be well advised to merely file an express abandonment of the said application rather than continue to invest in an trademark application that may never register. That is what we encourage the applicant in this case to do. No money has to exchange hands, if the Applicant chooses to file a express abandonment with prejudice of its said application at issue within ten days.

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If you have any questions please feel free to call me at 773-589-0340.

Most cordially,



Leo Stoller  
GOOGLE  
P O Box 35189  
Chicago, IL 60707  
Tel: 773/283-3880  
FAX: 708/453-0083

### **What is this Cease and Desist Letter**

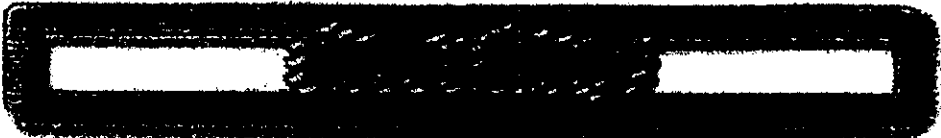
Success breeds imitation. The more popular and successful a Trademark and/or intellectual property becomes, the more probable the chances that infringing products, services or companies calling themselves the name of the successful trademark will appear.

The opportunity to take for free what others pay a royalty for is a strong incentive to some companies. Contrary to the mistaken notion, that any well known symbol and/or word that may be found in the dictionary is freely available to any company to adopt as their trade name, service mark or trademark, in the 21<sup>st</sup> Century, is simply false. There are no well known trademarks, service marks, trade names and/or domain names that have not already been adopted by some other company first. as in the case at bar. In the same manner that there are not any real property in the 21<sup>st</sup> Century that can be acquired for free or homesteaded. There are no free well known intellectual property left in the 21<sup>st</sup> Century. No free rides! However it is our obligation, as the Trademark owner to police and protect our intellectual property each and every day. Otherwise an intellectual property owner will not own it's property for long. Since there are no well known marks that have not been adopted by some company. there will always be a legal battle by companies to take those finite well known marks from their original owners without compensation.

Thus, once an infringer is identified, it is imperative that the infringer be stopped. However, filing a lawsuit immediately is neither suggested nor viable. The first step that must be taken is to alert the infringer. That you have been identified and it is demanded that you cease and desist from the sale and offering for sale of the infringing products or services or using our well known trademark as your company name, tradename, trademark, service mark and/or domain name. This warning included a recitation of all the actions required by you, the alleged infringer, such as identifying all profits made from the infringing products or services or the use of a confusingly similar corporate name. There can be grave consequences by continuing the alleged infringement. Furthermore, it is good business practice to put you on notice before litigation may be pursued. It always pays to first attempt to resolve trademark controversies outside of Court intervention. Please call us at 773-283-3880 to resolve this controversy.

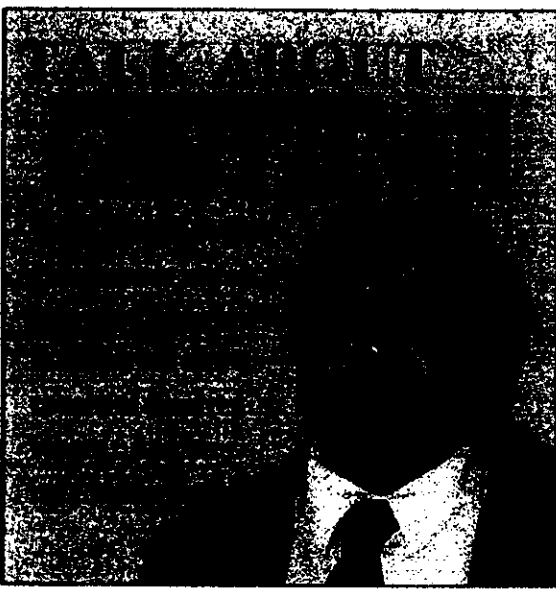


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**TALK ABOUT CHUTZPAH: This Chicago Jewish entrepreneur says he owns the rights to that word and a couple of hundred others. And he isn't kidding.**  
By Pauline Dubkin Yearwood

owns hundreds of common English words, from "adventure" to "zesty," and an equal number of phrases—"a bad dream," "bases loaded," "panic button," "sit back, relax, enjoy the ride."

That last one is one that wouldn't seem to apply to Stoller, a 59-year-old, Jewish suburban Chicago man who is so well known for his practice of claiming trademark rights and threatening and bringing lawsuits that he has his own entry in Wikipedia, the online encyclopedia.

Check out his Web site and you'll learn that Stoller's company, Rentamark.com, "is able to license your company with any one of our famous trademarks that will allow your business to sell its products and services worldwide."

He is currently engaged in a high-profile legal dispute with Sony's Columbia Pictures over its movie about elite Navy pilots titled "Stealth," now playing in Chicago and elsewhere. Stoller attempted to force the studio to change the name of the movie and pay him royalties for use of the term "stealth," which he says he first registered as the trademark of a line of sporting goods in 1985.

Does that mean that Stoller owns the word "stealth"? Or, for that matter, "chutzpah," which is also on his list?

Can someone even own a word?

Another question: Is Leo Stoller an energetic entrepreneur or an "unscrupulous shyster," as a blogger, one of a number of online enemies, refers to him? A David who defends intellectual property rights or a Goliath who makes a living by sending frivolous cease-and-desist letters to companies and individuals who, as another blogger claims, "pay him off ... because it's cheaper to settle than fight"?

Ah, that is the question (a phrase Stoller has no doubt trademarked).

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# 'Stealth' fighter: Chicago man says movie name belongs to him

## Battling Columbia Pictures over title, possible merchandise

BY EMILY NGO  
Staff Reporter

On billboards and in movie trailers everywhere, big, bold letters spell out "Stealth," a Columbia Pictures film opening Friday about Navy pilots.

But those same big, bold letters also appear on Leo Stoller's list of federally registered trademarks, and he has hit the courts to make the case that "stealth" belongs to him.

"If a trademark owner doesn't police his trademark, it gets diluted and watered down," said Stoller, a 59-year-old owner of Rentamark.com, a Chicago company that licenses trademarks to others.

The legal battle over whether Columbia Pictures may use "Stealth" as the movie title and as the brand behind any marketed merchandise began with a cease-and-desist letter from Stoller in March, seeking to settle out of court.

Columbia Pictures then asked the federal court here to rule that Stoller did not have a trademark-infringement case. Stoller has responded with a counterclaim.

Even Stoller says he doesn't exclusively own "stealth" as a word.



Leo Stoller has trademarked names such as "TERMINATOR," which he says he didn't police aggressively enough. —BOB BLACK/SUN-TIMES

He owns it only in relation to products he has registered under that name, said Clinton Francis, professor of intellectual property law at Northwestern University. Among these products: toy airplanes. Not among them: movies.

"He has a reduced prospect of bringing infringement action" if Columbia Pictures markets only the movie, Francis said. "But if they try to create derivative toys in the name

EBERT: "Stealth" a cross between "Top Gun" and "2001." Page 45

'Stealth' . . . that's classic infringement, there's going to create consumer confusion, and [Columbia Pictures] would have to obtain a license from [Stoller] to use 'stealth.'"

'All our rights evaporated'

Stoller has licensed the name "STEALTH" for dozens of products and services. They include sporting goods, lawn sprinklers and "hunters' scent" spray. And orthodontic appliances.

Columbia Pictures refused comment because the matter is still in litigation.

Stoller said he wants to prevent the stealth matter from turning out the way "TERMINATOR" — another trademark of his — did in the 1980s.

"We didn't aggressively police our mark, and all the companies thought Carolco Pictures [the producer of the 'Terminator' films] was the primary user," Stoller said. "All our rights evaporated . . . there was a sucking sound from our company to theirs."

In years past, Stoller said, Rentamark has come to agreements with Northrop Grumman, contractor of the military's Stealth bomber, and with Nissan, manufacturer of the Sentra, another Stoller trademark.

# Fur flies in Uptown over dog-leash permits

BY LISA DONOVAN  
Staff Reporter

They growled about the cost, logic and bureaucracy of the \$35 fee for letting their pooches play in Chicago's dog-friendly spaces.

Those were the sentiments of some of the more than 100 dog owners and enthusiasts gathered Wednesday night in Uptown's Margate Park Fieldhouse to discuss a new permit required for dogs to play off-leash in Chicago Park District dog parks.

While most didn't mind the idea behind the measure — aimed at making sure dogs have checkups

lowed to mingle in such parks — some balked at the fee, which they described as steep.

The \$35 permit required for the first dog in a home and \$15 for each additional pup covers administration fees and maintenance for the park district's 10 lots and beaches where dogs can run off-leash.

'Not in the money business'

Eric Miller, a lawyer and Uptown resident, said he wanted to know who came up with this Cook County mandate that the Park District must now enforce.

"Nobody seems to be taking responsibility for the way this thing

several park district and county representatives, who explained the process and took questions.

Among them was Dan Parmer, an administrator with the Cook County Animal Control Unit. When Miller wasn't satisfied with the answer he got, he said, "It's been presented to us as a . . . requirement, but it looks like a grab for money."

An exasperated Parmer fired back, "I'm not in the money business; I'm not asking to be."

Parmer explained that other cities in the county already require such permits. In Chicago the Park District is making permit applica-

FINAL 4  
**BIG  
SID  
S**

EVERYTHING YOU



HAMILTON  
BY Baldwin  
MSRP \$4,095  
**\$2690**  
WITH BENCH



KOHLER  
DIGITAL GRAND  
**\$4795**



88 NOTE DIGITALS  
MSRP \$1995  
**\$495**

USED PIANOS &

PRE-OWNED U  
STEINWAY C  
AND UPRIG  
CALL FOR P

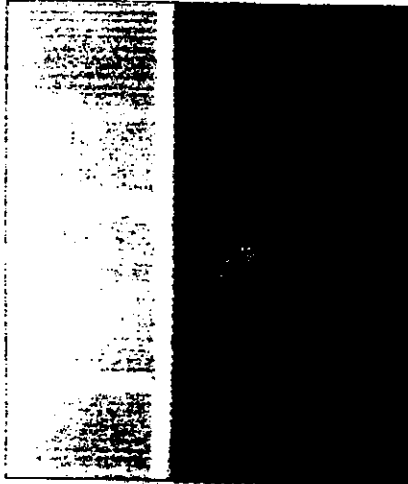
HURRY IN

THE  
PIANO  
EXPERTS

\*Savings are off MSRP prices and

▲ Dow 30 Industrials + 57.22, 10,627.09 | ▲ S&P 500 + 8.82, 1,226.70 | ▲ Nasdaq + 10.22, 2,188.22 | ▲ Russell 2000 + 2.99, 670.78

## IN BRIEF



### He protects 'stealth' with determination

Leo Stoller says he owns the trademark on the word "stealth." And businesses know he's not kidding. **THE INSIDER, 3D**

### Trinsic gets extension on Nasdaq delisting

Trinsic Inc. said Wednesday its stock will remain listed on the Nasdaq SmallCap Market because of a temporary exemption it received from Nasdaq listing rules requiring a minimum market capitalization and bid price. To keep its shares listed on Nasdaq, the Tampa phone company must meet certain conditions, including raising its stock price to \$1 a share by Sept. 30 and keeping it that price or above for at least 10 straight trading days. Beginning Friday, Trinsic's stock will trade under the ticker symbol TRINC until it complies with all conditions. Trinsic released the Nasdaq news after its stock closed unchanged Wednesday

# Delta CEO:

**BANKRUPTCY LOOMS:** Employees are told that while aggressive cutting has helped, the airline is in a race to meet its goals.

By **STEVE HUETTEL**  
Times Staff Writer

Delta Air Lines must take more steps to return to profitability as the carrier fights to stay out of bankruptcy court, chief executive Gerald Grinstein has warned employees.

While Delta's plan to save \$5-billion annually by the end of 2006 is paying off, high

fuel prices and crushing debt must be done quickly, a memo distributed any new cost-cutting

Delta's shares fell 26 percent on the closing at \$2.95, a 10 percent drop.

The nation's third largest airport reported a \$382-million loss last week, a record for the airport.

## 'EMPLOYEE-DI



Marketing & Technology  
Viewing Films, Taking a Call  
A new service will play movies, sports and concerts on a cellphone. Oh, and it can still make a phone call. **CS**

Marketing  
Private War to Protect a Word  
Leo Stoller has spent years defending his trademark to "stealth." The latest fight is with Columbia Pictures. **CS**

Call  
Anc  
U.S.  
Live

# Business Day

The New York Times

## Hands-On Readers

### Why Newspapers Are Betting on Audience Participation

By KATHARINE Q. SEELYE

GREENSBORO, N.C. — "Get me rewrite!"  
For years those words evoked the romanticism of the newspaper business, back when swashbuckling reporters landed scoops with derring-do. Today they mean something else entirely, at least here where the people at The News & Record, the local daily, are toiling to reinvent their newspaper.

In this world, "Get me rewrite" will in effect be a menu option, a way for unhappy readers to go online and offer their own versions of articles they do not like. Their hope is to convert the paper, through its Web site, www.news-record.com, into a virtual town square, where citizens have a say in the news and where every reader is a reporter.

This feature, part of a planned overhaul of The News & Record's Web site that is to begin next week, is a potent symbol of a transformation taking place across the country, where top-down, voice-of-God journalism is being chal-

lenged by what is called participatory journalism, or civic or citizen journalism.

Under this model, readers contribute to the newspaper. And they are doing so in many forms, including blogs, photos, audio, video and podcasts.

Whether such efforts can revive revenue for newspaper publishers is an open question. But with gloomy financial forecasts and declines in circulation, some papers are starting to see participatory journalism as their hope for reconnecting with their audiences.

In some cases, like Backfence.com, in suburban Virginia, citizens are the only contributors, and the "newspaper" is an unedited Web site. In Bluffton, S.C., Blufftontoday.com is made up largely of reader contributions, but some of the content is also published in a colorful tabloid newspaper and distributed free to residents. In Colorado, The Rocky Moun-

Continued on Page 4

DAVID CARR

## Big Media Wants a Piece Of Your Pod

Little us could probably agree that any time Paris Hilton and General Motors converge in the same thing, a significant cultural moment is under way.

Recently, those two remarkably different brands decided it was worth their time and effort to put together a podcast. On a podcast for the movie "House of Wax," Ms. Hilton talks about the onerous responsibilities of being publicity for the film. G.M., meanwhile, used one of its recent podcasts to introduce the 2008 Buick Lucerne, which combines high-level technology and luxury features with a spacious quiet interior. Notably, the carmaker used a recording that might apply equally to the Lucerne or Ms. Hilton: "It's body

BY THE DOZEN  
The FCC attacks  
the Internet

LIVE 8 CONCERTS

CLOSE ENCOUNTER  
WAS ALWAYS IN 'WAR

## WHY OBTAIN A *GOOGLE*® LICENSE...

Americans are brand conscious. More than 95 percent of all products sold in America are branded goods and more than \$120 billion is spent in advertising to create and maintain brand images for those products. The reason: Consumers' buying habits are tied to how they think and feel about a brand.

In today's competitive marketplace, the licensing of brand names for new products - essentially, borrowing an established brand name in order to sell more product - has become increasingly prevalent. Sales of licensed products in the U.S. now total more than \$151 billion a year and over 40% of all goods sold are licensed products.

The reasons are simple. Building a brand image for a new product is extremely costly. And there's no guarantee that an expensive brand image campaign will work. Licensing your products and services under an established trademark brings instant recognition and acceptance with your customers. Licensing endows your products and services with the power of the images carried by the brand name trademark, giving you the opportunity to:

- \* Introduce products more easily and enter the market from a position of strength.
- \* Achieve instant customer awareness and help increase market share without risking large marketing expenditures.
- \* Create instant enthusiasm and interest among your customers.
- \* Sell a greater volume of products or services due to your customers' increased interest.
- \* Sell your products or services for a greater profit margin.
- \* Avoid trademark litigation.

Licensing an established trademark for your products or services just makes good business sense. The enormous power of *GOOGLE*® trademarks can mean instant buyer appeal for your products and services. As a *GOOGLE*® licensee, you are part of a team company already marketing their products and services using *GOOGLE*® trademarks. Their success is proof of what a *GOOGLE*® license can do for you.

## **GOOGLE® LICENSING PROGRAM**

### **Licensee Requirements**

As a prerequisite for becoming a *GOOGLE®* licensee, a distributor, manufacturer or service company should consider the following requirements:

#### **PRODUCT OR SERVICE CATEGORY:**

An appropriate product category that would utilize and compliment the *GOOGLE®* image.

#### **MARKETING:**

A proven track record of marketing.

#### **RESOURCES:**

Adequate resources - production, financial and manpower to undertake such an expanded program.

#### **STYLING AND QUALITY:**

Ability to ensure good styling and consistent quality products or services.

#### **PRODUCTION:**

Efficient manufacturing and/or sourcing to ensure on-time delivery of value packed products.

#### **OBJECTIVES:**

Long-term objectives of continued growth in sales and profits.

To an increasing extent, all types of buyers, including buyers for mass market retail outlets, are demanding brand names with image. Their customers want established brand names as a guarantee of quality, value and good styling. More and more manufacturers are being encouraged to provide brand names in order to maintain and expand their market position. Some companies who already have one or more brand names are seeking additional identification programs due to their demonstrated success with branded goods and services. Others, who have no brands or the wrong brands, need a brand to survive.

For companies that qualify, the *GOOGLE®* brand could be the answer.

## **GOOGLE® LICENSING PROGRAM**

See Rentamark famous brands available for licensing at  
[www.rentamark.com](http://www.rentamark.com)

The nature of the major terms of the License Agreement are indicated hereunder.

### **ROYALTY RATE:**

Royalty rates are a negotiable percent of the sale price charged by Licensee for each licensed product and/or service sold.

### **TERM OF AGREEMENT:**

Basic life of agreement coordinated with requirements of product development; usually three or more contract years, with the first contract year being long enough to allow "start-up" time.

### **MINIMUM SALES:**

Minimum sales target projections mutually determined.

### **MINIMUM ROYALTIES:**

Annual guaranteed minimum royalty realistically assessed.

### **ADVANCE PAYMENT:**

A reasonable portion of the Minimum Royalties (not an additional fee).

### **RENEWALS:**

Renewal terms based on performance to capitalize upon success of the program.

**LICENSING *GOOGLE*® ENABLES YOU TO ...**

- \* DIFFERENTIATE AMONG PARTY PRODUCTS
- \* ENJOY EASIER TRADE ACCEPTANCE
- \* JUSTIFY A PREMIUM PRICE POINT
- \* GENERATE QUICK CONSUMER TRIAL
- \* ACHIEVE SIGNIFICANT MARKET SHARE QUICKLY
- \* AVOID TRADEMARK LITIGATION

***STEALTH*®, *SENTRA*®, *TERMINATOR*®,  
*HYPERSONIC*® & *DARK STAR*®**

**D/B/A**

**RENTAMARK.COM**

**P. O. Box 35189**

**Chicago, IL 60707-5189**

**Phone: (773) 283-3880 Fax: (708) 453-0083**

**Email: [info@rentamark.com](mailto:info@rentamark.com)**

**See our list of other famous brands available for  
licensing at [www.rentamark.com](http://www.rentamark.com)  
Contact us about representing and licensing your brand**



## **PROTECT YOUR COMPANY'S ASSETS WITH A RENTAMARK® BRAND TRADEMARK LICENSE**

Pick the wrong name for your new product or service and you stand to LOSE BIG TIME! That's what lots of companies learn when they find themselves on the wrong side of a trademark infringement action. Over \$2 billion was spent last year in litigation and legal expenses due to **misuse of trademarks**. And it's not only the Fortune 500 firms who get hurt. It's the small to mid-size companies with little experience in trademark law, who often don't find out until an attorney sends a warning letter to "cease and desist" or you get served with a Federal Trademark infringement lawsuit.

Any company can pay hundreds of thousands of dollars in legal expenses fighting an infringement suit with no guarantee of success. If you lose, you'll not only have to rename your product, reprint all the sales literature, and redo the advertising, you'll also **suffer a major loss** of credibility with your customers ..... and possibly owe treble damages to the winner and attorneys' fees. For many, the enormous legal expenses of defending a trademark dispute can literally mean the END OF YOUR BUSINESS.

Now you can protect your business with a **RENTAMARK®** famous brand trademark license agreement. Merely choose a **RENTAMARK®** brand famous trademark for use on your product or service and allow **RENTAMARK®** to police and protect the trademark.

Some of our famous brand names include, but are not limited to:

***SENTRA®***  
***STEALTH®***  
***DARK STAR®***  
***TERMINATOR®***  
***AIRFRAME®***  
***HYPERSONIC®***  
***NIGHT STALKER®***  
***STRADIVARIUS®***  
***TRILLIUM®***

Visit our website at: **WWW.RENTAMARK.COM**





**AGREEMENT TO DISCONTINUE USE**  
**(Covenant Not To Sue)**

**AGREEMENT**, is made and entered into as of this 21<sup>st</sup> day of NOV, 2005, by and between **RENTAMARK.COM**, P O Box 35189, Chicago, Illinois 60707-0189 (hereinafter referred to as "GOOGLE "), and **GOOGLE INC., CORPORATION DELAWARE; 1600 Amphitheatre Parkway; Building 41; Mountain View, CA 94043** (hereinafter referred to as "GOOGLE INC.").

WHEREAS, **GOOGLE** and **GOOGLE INC.** desire to settle this dispute and future disputes regarding **GOOGLE INC.**'S use of the mark **GOOGLE**.

NOW, THEREFORE, in consideration of the mutual covenants set forth herein, the parties agree to as follows:

1. **GOOGLE** agrees not to sue **GOOGLE INC.** for any unauthorized use of selling **GOOGLE** brand goods in the **past and/or present use** of the trademark **GOOGLE**.

1.1 **GOOGLE INC.** agrees to discontinue all use of the mark **GOOGLE** and any mark confusingly similar to the mark **GOOGLE** in the opinion of **GOOGLE** , **by April 29, 2007**.

2. The parties agree that this Agreement constitutes the entire agreement and understanding between the parties related to the subject matter hereof, superseding all previous communications, and that this Agreement can only be modified in writing signed by both parties.

3. **GOOGLE INC.** acknowledges **GOOGLE**'s exclusive ownership of the mark **GOOGLE** and agrees not to oppose **GOOGLE**'s applications or **GOOGLE**'s use of its **GOOGLE** mark(s).

4. This Agreement shall be valid worldwide.

5. This agreement inures to the benefit of, and is binding upon, **GOOGLE** and **GOOGLE INC.**, their parents, subsidiaries, sister companies, affiliates, entities which control the foregoing, entities which the foregoing control, and all of their successors and assigns.

6. The parties agree that this agreement will be maintained confidential.

7. This agreement becomes null and void on **December 20, 2005** if **GOOGLE** has not receive an executed copy from **GOOGLE INC.**

8. **GOOGLE** and **GOOGLE INC.** have caused this Agreement to be executed by their duly authorized legal representatives.

**ACCEPTED AND AGREED:**

GOOGLE

*Leo Stoller*

Representative of GOOGLE

Date: NOV 27, 05

*Leo Stoller*

Signing Representative of GOOGLE  
[PRINTED]

Date: NOV 29, 05

C:\MARKS44\GOOGLE.TRO

GOOGLE INC.

\_\_\_\_\_  
Representative of:  
GOOGLE INC.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signing Representative of:  
GOOGLE INC.  
[PRINTED]

Date: \_\_\_\_\_



## Trademarks > Trademark Electronic Search System(Tess)

TESS was last updated on Sat Nov 26 04:10:40 EST 2005

[TESS HOME](#)
[NEW USER](#)
[STRUCTURED](#)
[FREE FORM](#)
[BROWSE LIST](#)
[SEARCH OG](#)
[BOTTOM](#)
[HELP](#)

Please logout when you are done to release system resources allocated for you.

### Record 1 out of 1

[TARR Status](#)
[ASSIGN Status](#)
[TDR](#)
[TTAB Status](#)
 (Use the "Back" button of the Internet browser to return to TESS)

# Google

**Word Mark** GOOGLE

**Goods and Services**

IC 009. US 021 023 026 036 038. G & S: Computer software for searching, compiling, indexing and organizing information on computer networks; computer hardware, computer software for searching, compiling, indexing, and organizing information within individual workstations and personal computers; computer software for creating indexes of information, indexes of web sites and indexes of other information resources; mouse pads. FIRST USE: 20001100. FIRST USE IN COMMERCE: 20001100

IC 011. US 013 021 023 031 034. G & S: lamps. FIRST USE: 20020600. FIRST USE IN COMMERCE: 20020600

IC 012. US 019 021 023 031 035 044. G & S: License plate frames and holders. FIRST USE: 20020600. FIRST USE IN COMMERCE: 20020600

IC 016. US 002 005 022 023 029 037 038 050. G & S: notebooks, pens, stickers, decals. FIRST USE: 20020600. FIRST USE IN COMMERCE: 20020600

IC 018. US 001 002 003 022 041. G & S: Bags, namely, tote bags, duffel bags, backpacks; umbrellas. FIRST USE: 20020600. FIRST USE IN COMMERCE: 20020600

IC 021. US 002 013 023 029 030 033 040 050. G & S: Mugs, tumblers. FIRST USE: 20020600. FIRST USE IN COMMERCE: 20020600

IC 025. US 022 039. G & S: Clothing, namely, shirts, t-shirts, vests, hats, caps, boxer shorts; children's clothing, namely, t-shirts. FIRST USE: 20010100. FIRST USE IN COMMERCE: 20010100

IC 028. US 022 023 038 050. G & S: Toys and sporting equipment, namely plastic exercise balls.

FIRST USE: 20010100. FIRST USE IN COMMERCE: 20010100

IC 035. US 100 101 102. G & S: Electronic retailing services via computer featuring mouse pads, lamps, license plate frames and holders, notebooks, pens, stickers, decals, tote bags, duffle bags, backpacks, umbrellas, mugs, tumblers, shirts, t-shirts, modem cords, toys, vests, caps, hats, and other clothing items. FIRST USE: 19990731. FIRST USE IN COMMERCE: 19990731

IC 038. US 100 101 104. G & S: providing multiple user access to proprietary collections of information by means of global computer information networks. FIRST USE: 19970900. FIRST USE IN COMMERCE: 19970900

IC 042. US 100 101. G & S: Computer services, namely, providing software interfaces available over a network in order to create personalized on-line information services; extraction and retrieval of information and data mining by means of global computer networks; creating indexes of information, indexes of web sites and indexes of other information sources in connection with global computer network; providing information from searchable indexes and databases of information, including text, electronic documents, databases, graphic and audio visual information, by means of global computer information networks. FIRST USE: 19970900. FIRST USE IN COMMERCE: 19970900

**Mark Drawing Code** (5) WORDS, LETTERS, AND/OR NUMBERS IN STYLIZED FORM

**Design Search Code**

**Serial Number** 76314811

**Filing Date** September 18, 2001

**Current Filing Basis** 1A

**Original Filing Basis** 1A

**Published for Opposition** November 1, 2005

**Owner** (APPLICANT) GOOGLE INC. CORPORATION DELAWARE 1600 Amphitheatre Parkway Building 41 Mountain View CALIFORNIA 94043

**Assignment Recorded** ASSIGNMENT RECORDED

**Attorney of Record** Julia Anne Matheson

**Description of Mark** The mark consists of The first letter "G" is blue; the second letter "O" is red; the third letter "O" is yellow; the fourth letter "G" is blue; the fifth letter "L" is green; and the sixth letter "E" is red. The drawing is lined for the color(s) red, blue, green and yellow.

**Type of Mark** TRADEMARK. SERVICE MARK

**Register** PRINCIPAL

**Live/Dead Indicator** LIVE

TESS HOME NEW USER STRUCTURED FREE FORM BROWSE LIST SEARCH OG TGP HELP

**Thank you for your request. Here are the latest results from the TARR web server.**

**This page was generated by the TARR system on 2005-11-29 00:20:05 ET**

**Serial Number:** 76314811 Assignment Information

**Registration Number:** (NOT AVAILABLE)

**Mark**



**(words only):** GOOGLE

**Standard Character claim:** No

**Current Status:** A request for an extension of time to file an opposition has been filed at the Trademark Trial and Appeal Board.

**Date of Status:** 2005-11-27

**Filing Date:** 2001-09-18

**Transformed into a National Application:** No

**Registration Date:** (DATE NOT AVAILABLE)

**Register:** Principal

**Law Office Assigned:** LAW OFFICE 114

**Attorney Assigned:**  
FIRST VIVIAN M Employee Location

**Current Location:** 650 -Publication And Issue Section

**Date In Location:** 2005-09-22

---

**LAST APPLICANT(S)/OWNER(S) OF RECORD**

---

1. GOOGLE INC.

**Address:**  
GOOGLE INC.

1600 Amphitheatre Parkway Building 41  
Mountain View, CA 94043  
United States  
**Legal Entity Type:** Corporation  
**State or Country of Incorporation:** Delaware

---

**GOODS AND/OR SERVICES**

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**International Class:** 009

Computer software for searching, compiling, indexing and organizing information on computer networks; computer hardware, computer software for searching, compiling, indexing, and organizing information within individual workstations and personal computers; computer software for creating indexes of information, indexes of web sites and indexes of other information resources; mouse pads

**First Use Date:** 2000-11-00**First Use in Commerce Date:** 2000-11-00**Basis:** 1(a)**International Class:** 011

lamps

**First Use Date:** 2002-06-00**First Use in Commerce Date:** 2002-06-00**Basis:** 1(a)**International Class:** 012

License plate frames and holders

**First Use Date:** 2002-06-00**First Use in Commerce Date:** 2002-06-00**Basis:** 1(a)**International Class:** 016

notebooks, pens, stickers, decals

**First Use Date:** 2002-06-00**First Use in Commerce Date:** 2002-06-00**Basis:** 1(a)**International Class:** 018

Bags, namely, tote bags, duffle bags, backpacks; umbrellas

**First Use Date:** 2002-06-00**First Use in Commerce Date:** 2002-06-00**Basis:** 1(a)**International Class:** 021

Mugs, tumblers

**First Use Date:** 2002-06-00**First Use in Commerce Date:** 2002-06-00

**Basis:** 1(a)

**International Class:** 025

Clothing, namely, shirts, t-shirts, vests, hats, caps, boxer shorts; children's clothing, namely, t-shirts

**First Use Date:** 2001-01-00

**First Use in Commerce Date:** 2001-01-00

**Basis:** 1(a)

**International Class:** 028

Toys and sporting equipment, namely plastic exercise balls

**First Use Date:** 2001-01-00

**First Use in Commerce Date:** 2001-01-00

**Basis:** 1(a)

**International Class:** 035

Electronic retailing services via computer featuring mouse pads, lamps, license plate frames and holders, notebooks, pens, stickers, decals, tote bags, duffle bags, backpacks, umbrellas, mugs, tumblers, shirts, t-shirts, modem cords, toys, vests, caps, hats, and other clothing items

**First Use Date:** 1999-07-31

**First Use in Commerce Date:** 1999-07-31

**Basis:** 1(a)

**International Class:** 038

providing multiple user access to proprietary collections of information by means of global computer information networks

**First Use Date:** 1997-09-00

**First Use in Commerce Date:** 1997-09-00

**Basis:** 1(a)

**International Class:** 042

Computer services, namely, providing software interfaces available over a network in order to create personalized on-line information services; extraction and retrieval of information and data mining by means of global computer networks; creating indexes of information, indexes of web sites and indexes of other information sources in connection with global computer network; providing information from searchable indexes and databases of information, including text, electronic documents, databases, graphic and audio visual information, by means of global computer information networks

**First Use Date:** 1997-09-00

**First Use in Commerce Date:** 1997-09-00

**Basis:** 1(a)

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#### ADDITIONAL INFORMATION

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**Description of Mark:** The mark consists of The first letter "G" is blue; the second letter "O" is red; the third letter "O" is yellow; the fourth letter "G" is blue; the fifth letter "L" is green; and the sixth letter



"E" is red.

**Lining and Stippling:** The drawing is lined for the color(s) red, blue, green and yellow.

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**MADRID PROTOCOL INFORMATION**

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(NOT AVAILABLE)

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**PROSECUTION HISTORY**

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2005-11-27 - Extension Of Time To Oppose Received  
2005-11-01 - Published for opposition  
2005-10-12 - Notice of publication  
2005-09-06 - Law Office Publication Review Completed  
2005-09-06 - Assigned To LIE  
2005-08-26 - Assigned To LIE  
2005-08-24 - Approved for Pub - Principal Register (Initial exam)  
2005-08-24 - EXAMINERS AMENDMENT E-MAILED  
2005-08-24 - Examiners Amendment -Written  
2005-08-10 - Previous allowance count withdrawn  
2005-07-29 - Withdrawn Before Publication  
2005-04-22 - Law Office Publication Review Completed  
2005-04-18 - Assigned To LIE  
2005-04-15 - Assigned To LIE  
2005-04-13 - Approved for Pub - Principal Register (Initial exam)  
2005-03-22 - Amendment From Applicant Entered  
2005-02-17 - Communication received from applicant  
2005-02-17 - TEAS Response to Office Action Received  
2005-02-17 - Petition To Revive-Granted  
2005-02-17 - TEAS Petition To Revive Received

2005-02-10 - TEAS Change Of Owner Address Received  
2005-02-10 - TEAS Change of Correspondence Received  
2005-01-06 - Abandonment Notice Mailed - Failure To Respond  
2005-01-06 - Abandonment - Failure To Respond Or Late Response  
2004-06-04 - Final refusal e-mailed  
2003-10-08 - Case File in TIGRS  
2003-03-28 - Letter of suspension mailed  
2003-01-03 - Case file assigned to examining attorney  
2002-12-30 - Petition To Revive-Granted  
2002-10-28 - Petition To Revive-Received  
2002-10-28 - Communication received from applicant  
2002-10-28 - PAPER RECEIVED  
2002-11-04 - TEAS Change of Correspondence Received  
2002-09-19 - Abandonment - Failure To Respond Or Late Response  
2002-01-17 - Non-final action mailed  
2002-01-15 - Case file assigned to examining attorney  
2001-12-28 - Case file assigned to examining attorney  
2001-12-04 - Case file assigned to examining attorney

---

#### CORRESPONDENCE INFORMATION

---

**Correspondent**

Julia Anne Matheson (Attorney of record)

Rose Hagan

Google Inc.

Building 41

1600 Amphitheatre Parkway

Mountain View CA 94043

**Phone Number:** 6506234560

**Fax Number:** 6506188571

# **EXHIBIT J**

GOOGLE LICENSING  
7115 W. North Avenue #272  
Oak Park, IL 60302



Michael Zeller  
Quinn Emanuel  
865 South Alhambra Street, 10<sup>th</sup> Floor  
Los Angeles Ca 90017

# **EXHIBIT K**

FOR SETTLEMENT ONLY NOT DISCOVERABLE RULE 408

**GOOGLE™** BRAND TRADEMARK LICENSING  
650-618-8571

**Facsimile Transmittal**Date: 04/10/06To: MS ROSE HAGAN ESQFrom: LED STOLLERSubject: CENTRAL V. GOOGLE opp. NO\* 91170256No. of Pages: 1 of 3 NOTICE OF DEPOSITION

(including this one)

LARRY PAGE AND SERGEY BRAIN

We are not, fyiing Google that we  
will take the said depositions on  
APRIL 28, 2006 AT YOUR OFFICE.  
AT 10:AM LARRY PAGE 2:00 PM MR BRAIN.

7115 W. North Avenue #272

NEW Address: Oak Park, IL 60302

Fax: (773) 589-0915

Voice: (773) 589-0340

Email: [info@rentamark.com](mailto:info@rentamark.com)

CAUTION: The information contained in this facsimile message is confidential and intended solely for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution, or unauthorized use of this communication is strictly prohibited. If you have received this facsimile in error, please notify the sender immediately by telephone, and return the facsimile to the sender at the address above via the United States Postal Service. 7115 W. North Ave. #272, Oak Park, IL 60302



United States Patent and Trademark Office

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TTABVUE. Trademark Trial and Appeal Board Inquiry System

Opposition

Number: 91170256

Filing Date: 03/01/2006

Status: Pending

Status Date: 04/08/2006

Interlocutory Attorney: CINDY B GREENBAUM

Defendant

Name: GOOGLE INC.

Correspondence: Rose Hagan  
Google Inc.  
Building 41 1600 Amphitheatre Parkway  
Mountain View, CA 94043

Serial #: 76314811

Application Status: Opposition Pending

Mark: GOOGLE

Plaintiff

Name: CENTRAL MFG. CO. (INC.)

Correspondence: LEO STOLLER  
CENTRAL MFG. CO. (INC.) TRADEMARK & LICENSING DEPT.  
P.O. BOX 35189  
CHICAGO, IL 60707-0189

Prosecution History

#	Date	History Text	Due Date
3	04/08/2006	PENDING, INSTITUTED	
2	04/08/2006	<u>NOTICE AND TRIAL DATES SENT; ANSWER DUE:</u>	05/18/2006
1	03/01/2006	<u>FILED AND FEE</u>	

Results as of 04/09/2006 01:10 PM [Back to search results](#)

Search:

United States Patent and Trademark Office  
Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

Mailed: April 8, 2006

Opposition No 91170256  
Serial No. 76314811

GOOGLE INC.  
ATTN: ROSE HAGAN  
1600 AMPHITHEATRE PARKWAY, BLDG. 41  
MOUNTAIN VIEW, CA 94043

CENTRAL MFG. CO. (INC.)

v.

GOOGLE INC.

LEO STOLLER  
CENTRAL MFG. CO. (INC.)  
TRADEMARK & LICENSING DEPT.  
P.O. BOX 35189  
CHICAGO, IL 60707-0189

**Angela Campbell, Paralegal Specialist:**

A notice of opposition to the registration sought in the above-identified application has been filed.<sup>1</sup> The notice of opposition can be viewed and printed at <http://ttabvue.uspto.gov/>

**ANSWER IS DUE FORTY DAYS** after the mailing date hereof. (See Trademark Rule 2.196 for expiration date falling on Saturday, Sunday or a holiday).

Proceedings will be conducted in accordance with the Trademark Rules of Practice, set forth in Title 37, part 2, of the Code of Federal Regulations. The parties are reminded of the recent amendments to the Trademark Rules that affect the rules of practice before the TTAB. See Rules of Practice for Trademark-Related Filings Under the Madrid Protocol Implementation Act, 68 Fed. R. 55,748 (September 26, 2003) (effective November 2, 2003); Reorganization of Correspondence and Other Provisions, 68 Fed. Reg. 48,286 (August 13, 2003) (effective September 12, 2003). Notices concerning the rules changes, as well as the Trademark Trial and Appeal Board Manual of Procedure (TBMP), are available at [www.uspto.gov/web/offices/dcom/ttab/](http://www.uspto.gov/web/offices/dcom/ttab/).

<sup>1</sup> Opposer's request for extension of time to oppose filed November 27, 2005 is noted and approved.



The parties are particularly referred to Trademark Rule 2.126 pertaining to the form of submissions. Paper submissions, including but not limited to exhibits and depositions, not filed in accordance with Trademark Rule 2.126 may not be given consideration or entered into the case file.

Discovery and testimony periods are set as follows:

Discovery period to open:	April 28, 2006
Discovery period to close:	October 25, 2006
30-day testimony period for party in position of plaintiff to close:	January 23, 2007
30-day testimony period for party in position of defendant to close:	March 24, 2007
15-day rebuttal testimony period for plaintiff to close:	May 08, 2007

A party must serve on the adverse party a copy of the transcript of any testimony taken during the party's testimony period, together with copies of documentary exhibits, within 30 days after completion of the taking of such testimony. See Trademark Rule 2.125.

Briefs shall be filed in accordance with Trademark Rule 2.128(a) and (b). An oral hearing will be set only upon request filed as provided by Trademark Rule 2.129.

**NOTE:** The Board allows parties to utilize telephone conferences to discuss or resolve many interlocutory matters that arise in inter partes cases. See the *Official Gazette* notice titled "Permanent Expansion of Telephone Conferencing on Interlocutory Matters in Inter Partes Cases Before the Trademark Trial and Appeal Board," 1235 TMOG 68 (June 20, 2000). The notice is available at <http://www.uspto.gov>. Interlocutory matters which the Board agrees to discuss or decide by phone conference may be decided adversely to any party which fails to participate.

If the parties to this proceeding are also parties to other Board proceedings involving related marks or, during the pendency of this proceeding, they become parties to such proceedings, they should notify the Board immediately, so that the Board can consider consolidation of proceedings.

#### New Developments at the Trademark Trial and Appeal Board

TTAB forms for electronic filing of extensions of time to oppose, notices of opposition, and inter partes filings are now available at <http://estta.uspto.gov>. Images of TTAB proceeding files can be viewed using TTABVue at <http://ttabvue.uspto.gov>.

# **EXHIBIT L**

FOR SETTLEMENT ONLY NOT DISCOVERABLE RULE 408

# GOOGLE™ BRAND TRADEMARK LICENSING

## Facsimile Transmittal

Date: 04/10/06  
 To: MS ROSE HAGAN ESP  
 From: LED STOLLER  
 Subject: SETTLEMENT OFFER OPP. NO 91170256  
 No. of Pages: 1 of 1

(including this one)

1) FILE AN EXPRESS ABANDONMENT NO FEE.

2) 27 TRADEMARK LICENSE

3) CONSENT TO REGISTER  
\$200,000.00 SN 76-314,811

OFFER VALID UNTIL 4/18/06

Fax: (773) 589-0915

Voice: (773) 589-0340

Email: info@rentamark.com

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# **EXHIBIT M**



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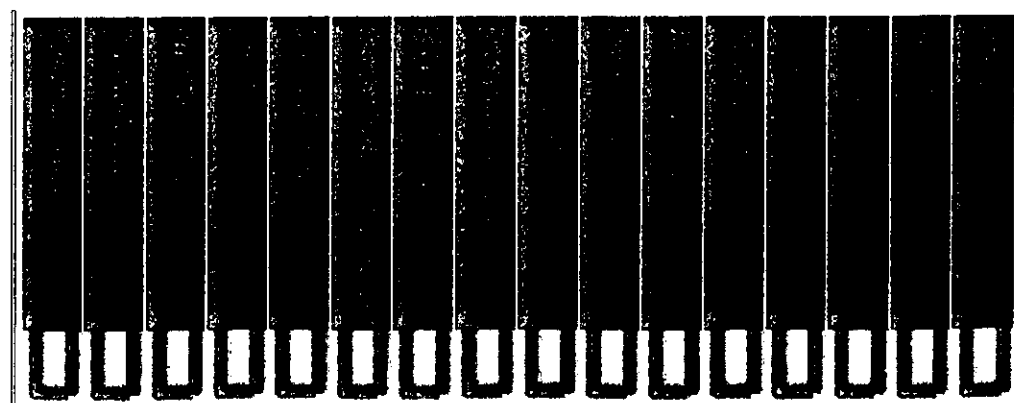
WordMarks A-D

WordMarks E-I

WordMarks J-O

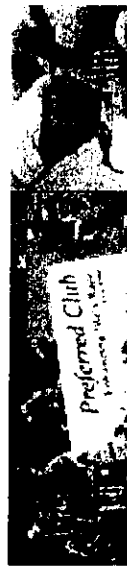
WordMarks P-S

WordMarks T-Z

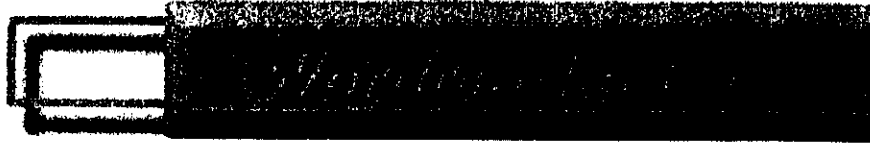




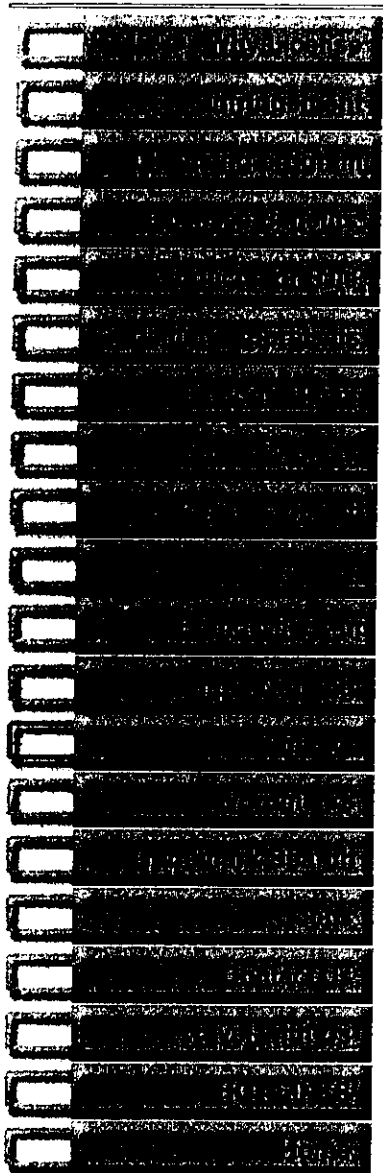
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STEALTH Great Selection  
MAIL Great Prices!



55

- 1ST PET
- 4 WORK
- 4-LEAF CLOVER
- 4-PLAY

- E YOUR BRAIN
- EACH IN HIS OWN WAY
- EACH SOLD SEPARATELY
- EAGER EYES
- EARLY RETIREMENT
- EARLY SUMMER MONTHS
- EARTH'S EYE
- EASIER TO UNDERSTAND
- EASIER TO USE
- EASIEST SOLUTION
- EASILY ACCESSIBLE
- EASILY PENETRATED
- EAST COAST
- EAST MEETS WEST
- EAST WEST
- EASY ACCESS
- EASY BREEZY
- EASY GUY, EASY GAL
- EASY SET UP
- EASY TO ACHIEVE GOALS
- EASY TO GET TO KNOW
- EASY TO NAVIGATE
- EASY TO OWN
- EASYGREEN
- EAT MY DUST
- EAT YOUR HEART OUT
- EATEN BY RATS
- EATING RIGHT
- ECHOSEED
- ECLIPSED EVERYTHING THAT HAS GONE BEFORE
- ECOLOGICAL RESERVE
- E-COMMERCE PARTNER
- ECOST
- ECOVAN

EDBE  
EDGAR  
EDGED IN STONE  
EDITOR-IN - C H I E F  
EDITOR'S DESK  
EDITORS HAVE FANTASIES  
EDY  
EF  
EFFECT ON YOUR LIFE  
EGO IS A MASK  
EGYPTIAN ARTIFACTS  
EIGHTY TWENTY  
ELECTRIFYING RESULTS  
ELECTRON  
ELEGANT JEWEL  
ELEGANTLY WASTED  
ELEVATOR SHAFT  
ELEVATOR WITH NO DOWN BUTTON  
ELIMINATE GUESSWORK  
ELIMINATE THE SITUATION  
ELLA  
EMBRACING NEW TECHNOLOGY  
EMERGENCY ROOM  
EMERGENCY ROOM DUTY  
EMERHAN  
EMOTIONAL IMPACT  
EMOTIONAL INTIMACY  
EMOTIONALLY ACCESSIBLE  
END GAME  
END IN SIGHT  
END OF THE WORLD  
END OF THE WORLD  
END OF TIME  
END RESULT  
ENDANGERED SPECIES  
ENDINGS, BEGINNINGS  
ENDLESS OPTIONS  
ENDLESS SUNSETS  
ENDLESS TOURNAMENT  
ENDS SOON  
END-TO-END SOLUTION  
ENERGIZE THE SPIRIT  
ENERGIZING BUSINESS  
ENERGY  
ENERGY BOOST  
ENJOY THE DIFFERENCE  
ENJOY THE LIMELIGHT  
ENJOY YOURSELF  
ENJOYED SPEAKING WITH YOU  
ENJOYMENT IS UNAVOIDABLE



ENOUGH SAID  
ENRICHING EXPERIENCE  
ENTER SECRET PASSCODE  
ENTER TO WIN  
ENTERTAIN US  
ENTERTAINING THE TROOPS  
ENTERTAINMENT OPTIONS  
ENTERTAINMENT PARADISE  
ENTICING ATTENTION  
ENTREPRENEUR  
ENTRY REQUIREMENT  
EONS OLD QUESTION  
EPIC TRANSFORMATION  
EQUESTRIAN CENTER  
EQUITY  
EROGENOUS ZONE  
EROGENOUS ZONE  
EROTIC DIALOGUE  
EROTIC HANGOVER  
EROTIC IMAGERY  
ESCAPE FROM WINTER  
ESCAPE ROUTE  
ESCAPE TO VANILLA WORLD  
ESP  
ESPECIALLY WELCOME  
ESSENCE OF EGOTISM  
ESSENCE OF LIFE  
ESSENCE OF THE CARIBBEAN  
ETERNAL BEAUTY  
ETHNIC FOOD  
EUPHORIC MORNING  
EVE OF BATTLE  
EVENING WITH TWINS  
EVENLY BALANCED  
EVENT DRIVEN  
EVER FEEL THIS GOOD  
EVER SEEN  
EVER SINCE  
EVER THE SHREWD ONE  
EVERLAND HAS A VILLAIN  
EVERY BOY HAS A DREAM  
EVERY CULTURE HAS A LEGEND  
EVERY FANTASY I EVER HAD  
EVERY MAN'S DREAM  
EVERY NOW AND THEN I FALL APART  
EVERY NOW AND THEN I GET A LITTLE BIT LONELY  
EVERY PART OF THE EARTH'S SURFACE IS STOLEN  
EVERY SECOND COUNTS  
EVERY WORD IS TRUE  
EVERYBODY'S CONNECTED

EVERYONE AND EVERYTHING WORKING TOGETHER  
EVERYONE'S FANTASY  
EVERYONE'S TASTES ARE DIFFERENT  
EVERYONE'S TOGETHER  
EVERYONE'S WIRED  
EVERYTHING CHANGES  
EVERYTHING YOU COULD WANT  
EVERYTHING YOU HEARD IS TRUE  
EVERYTHING YOU NEED  
EVERYTHING YOU NEED TO KNOW  
EVERYTHING YOU WANT  
EVERYTHING YOU WANTED TO KNOW  
EVERYWHERE  
EXCEED EXPECTATIONS  
EXCEED YOUR GOALS  
EXCEED YOUR HIGHEST EXPECTATIONS  
EXCEEDING YOUR EXPECTATIONS  
EXCELLENT EDUCATION  
EXCEPTIONAL BY DESIGN  
EXCESS BAGGAGE  
EXCITEMENT OVERLOAD  
EXCITEMENT WITH ABANDON  
EXCITING NIGHT LIFE  
EXCLUSIVE INTERVIEW  
EXCLUSIVE NEW BREED  
EXECUTIVE EDUCATION  
EXHILARATING SPORT  
EX-NAVY SEAL  
EXOTIC  
EXOTIC BEACH  
EXOTIC PLAYGROUND  
EXOTIC SEEDS  
EXPECT A SHAKEUP  
EXPECT EXCELLENCE  
EXPECT THE UNEXPECTED  
EXPECTS MORE LOYALTY  
EXPEDITION LEADER  
EXPERIENCE MAKES THE BEST TEACHER  
EXPLICIT LANGUAGE  
EXPLORE AFRICA  
EXPLORE THE POSSIBILITIES  
EXPLORE THE WORLD  
EXPLORING PERSONAL VISION  
EXPLOSIVES ARE MY SPECIALTY  
EXPRESS  
EXPRESS YOURSELF  
EXPRESSION  
EXQUISITELY INTENSE  
EXTRA BAGGAGE  
EXTRA EDGE

EXTRA EFFORT  
EXTRA LENGTH  
EXTRA MILE  
EXTRAMARITAL CRUSH  
EXTRAORDINARY BY NATURE  
EXTREME  
EXTREME PERFORMANCE  
EXTREME SPORT  
EXTREMELY ADAPTABLE  
EXTREMELY FLAMMABLE  
EYE CATCHING  
EYE CATCHING FETISH  
EYE DEPT  
EYE OF THE STORM  
EYE OPENER  
EYE WISE  
EYES AS BIG AS SAUCERS  
EYES LIKE FIRE IN THE NIGHT  
EYES ON THE FUTURE  
EYING YOUR TARGET  
EZ

F & F  
FRESH - FACED  
F2  
FABULOUS PHYSICS  
FACE  
FACE IT  
FACE OFF  
FACE TIME  
FACES  
FACE-TO-FACE  
FACON  
FACTOR  
FAILING ISN'T AN OPTION  
FAIR WEATHER  
FAIRIES  
FAKE IT  
FALL GUY  
FALL IN LOVE  
FALL IN LOVE AGAIN  
FALSE ALARM  
FAME AND FORTUNE  
FAMILIAR ENDING  
FAMILY  
FAMILY BUSINESS  
FAMILY ENTERTAINMENT  
FAMILY FUN  
FAMILY TREE

FAMILY VALUES  
FAMOUS BODIES  
FANCY FOOTWORK  
FAR CRY  
FAR FROM ANYTHING YOU'VE EVER EXPERIENCED  
FAR SUPERIOR  
FASHION CENTS  
FASHION MANTRA  
FASHION SHOW  
FAST  
FAST AND EASY  
FAST AND HARD  
FAST CONNECTION  
FAST FACTS  
FAST FINE  
FAST FORWARD  
FAST LANE  
FAST LAP TIME  
FAST TRACK  
FAST TRACK TO NOWHERESVILLE  
FAST, FURIOUS AND EXPENSIVE  
FASTEST GUN ALIVE  
FAST-PACED  
FAT CHANCE  
FATHER KNOWS BEST  
FATHER'S DAY  
FAVE STAR  
FAVORITE HAUNT  
FAVORITE SON  
FEAR OF BEING ALONE  
FEAR OF COMMITMENT  
FEAR OF LOSS  
FEARLESS FEMALE  
FEATURE PRESENTATION  
FEEDING FRENZY  
FEEL AT HOME  
FEEL FREE  
FEEL GOOD  
FEEL GOOD  
FEEL LIKE GUESTS  
FEEL THE HEAT  
FEEL THE PASSION  
FEEL THE TINGLE  
FEEL UPBEAT ABOUT THE ECONOMY  
FEEL WHAT IT DOES  
FEELING LIKE A CHAMP, NOT A CHUMP  
FEELING UP  
FEELINGS OF DESIRE  
FEELINGS OF LOVE  
FEELS GOOD TOO

FELL IN LOVE YESTERDAY, FELL OUT TODAY  
FEM  
FEMALE BODY BUILDER  
FEMALE EGO  
FEMALE HIGH NOTES  
FEMALE PERSUASION  
FEMME FATALE  
FEMME FATALE FROCKS  
FESS UP  
FESTIVAL SEEDLESS  
FEW THINGS LAST  
FIB  
FIBER  
FIELD TRIAL  
FIERCE BATTLE  
FIERCE FAMILY LOYALTY  
FIERY GLOW  
FIGHT CLUB  
FIGHT THE PROBLEM AT ITS SOURCE  
FILL 'ER UP  
FILL HER VOID  
FILM NOIR  
FILM STAR  
FILTHY AND FEMININE  
FINAL ACT  
FINAL ASSAULT  
FINAL CUT  
FINAL EFFORT  
FINAL FAREWELL  
FINAL NOTE  
FINAL PHASE  
FINAL WORD  
FINANCIAL CONTROL  
FIND A SEAT  
FIND HER, KEEP HER  
FIND IT HERE  
FINDING OUT MORE ABOUT YOURSELF  
FINDING SOMEONE YOU WANT A SECOND WITH  
FINE ART  
FINE TIME TO LEAVE ME  
FINE TUNING  
FINGER FOOD  
FINGO  
FIRE  
FIRE CALL  
FIRE GODDESS  
FIRE HIS PASSION  
FIRE THE CHAUFFEUR  
FIREWORKS DISPLAY  
FIRST CHAIR

FIRST CLASS  
FIRST CLASS ONLY  
FIRST GENERATION  
FIRST IMPRESSION  
FIRST KISS  
FIRST LOOK  
FIRST MISTRESS  
FIRST NAME BASIS  
FIRST OF TWO GOALS  
FIRST OPPORTUNITY  
FIRST PICK  
FIRST PRINCIPLE  
FIRST STRIKE  
FIRST THE GOOD NEWS  
FIRST TIME EVER  
FIRST TRY  
FISCALLY FIT  
FISH OUT OF WATER  
FISH TO CATCH  
FIT A TOKER'S PROFILE  
FIT FOR LIFE  
FIT THE BILL  
FITNESS AND FUN  
FITNESS FIX  
FITS LIKE A GLOVE  
FITTING IN  
FITTING TRIBUTE  
FITVIE  
FIX-IT  
FL  
FLAKE  
FLASH OF GENIUS  
FLASHBACK  
FLAT OUT  
FLAVOR OF THE MONTH  
FLAWLESS OLIVE SKIN  
FLED THE COUNTRY  
FLEET  
FLESH FEST  
FLESH PEDDLER  
FLESH-EATING MONSTER  
FLEX TIME  
FLICKER OF LOVE THAT STILL SHINES THROUGH  
FLICKING TONGUE  
FLIGHT  
FLIGHT DECK  
FLIRT WITH FANTASY  
FLIRTING ON-LINE  
FLOOD OF CHAOS  
FLORIDA KEYS

FLOURISH  
FLOWER  
FLOWER POWER  
FLY  
FLY LEAF  
FLY ME  
FLYING HIGH  
FOCUS GROUP  
FOCUS ON THE PRICE  
FOG CATCHER  
FOG LAMP  
FOLLOW THE RULES  
FOLLOW YOUR HEART  
FOLLOW YOUR INSTINCTS ALWAYS  
FOND MEMORIES  
FOOTPRINTS IN THE GOO  
FOR A FLEETING MOMENT  
FOR ADULTS  
FOR ALL THE ACTION  
FOR BEAUTIFUL CURVES  
FOR CYCLES  
FOR LIFE  
FOR LOVE OR MONEY  
FOR MEN  
FOR MEN AND WOMEN  
FOR REAL RESULTS  
FOR RELIEF  
FOR STARTERS  
FOR THE BODY TYPE  
FOR THE FIRST TIME  
FOR THE FUN OF IT  
FOR THE MAN IN YOUR LIFE  
FOR THE NEXT MILLENNIUM  
FOR THE REAL WORLD  
FOR THE SAKE OF ART  
FOR THE SPORTSMAN  
FOR THE WORKOUT YOU GIV  
FOR THINGS TO GET BETTER,  
FOR THIS FREE GUIDE CALL  
FOR WHEREVER LIFE TAKES YOU  
FOR WOMEN  
FOR WOMEN ON THE GO  
FOR YOUR PLEASURE  
FORBIDDEN SLOPES  
FORCE OF NATURE  
FORE MORE  
FORECAST TRACK  
FOREIGN SLOPES  
FOREPLAY BEGINS  
FOREST

FOREVER DIDN'T LAST LONG  
FOREVER DOESN'T LAST FOREVER  
FOREVER EXPLORING  
FOREVER IS A COUPLE OF YEARS  
FORGIVE AND FORGET  
FORM  
FORMIDABLE CONTENDER  
FORQUIET  
FORTUNE  
FORTUNE COOKIES  
FORTUNE SMILE  
FOUND LOVE  
FOUNTAIN  
FOUNTAIN OF LIFE  
FOUR HUNDRED  
FOX EYE  
FPR  
FQ  
FRAGMENTS OF TIME  
FRANK 'N FOOD  
FRANKIE  
FRAUD INVESTIGATION  
FREAK OF NATURE  
FREAKED OUT  
FREE  
FREE AT LAST  
FREE ENTERPRISE  
FREE FOR ALL  
FREE LOVE  
FREE POSTAGE  
FREE SOUL  
FREE SPEECH  
FREE SUBSCRIPTION  
FREE THE INNOCENT  
FREE WITH ADMISSION  
FREEDOM FROM THE JUNGLE  
FREEDOM OF EXPRESSION  
FREEDOM OF LOVE  
FREEDOM TO CHARGE  
FREEDOM TO CHOOSE  
FREEDOM TO DO WHAT YOU WANT  
FREEING PRISONERS  
FREELANCE ILLUSTRATOR  
FREELANCE WRITER  
FRENCH BISTRO  
FRENCH CREOLE  
FRENCH IMPRESSION  
FRENCH QUARTER  
FRESCO  
FRESH



FRESH AIR  
FRESH BREATH  
FRESH FACE  
FRESH FLAVOR  
FRESH IDEA  
FRESH MOUNTAIN AIR  
FRESH PERSPECTIVE  
FRESH VISION  
FRESH-BAKED PASTRIES  
FRESHER LOOK  
FRIDAY THE 13TH  
FRIENDS AND FOES  
FRIEND'S NETWORK  
FRIENDSHIPS ARE PROFESSIONALLY BASED  
FRITZ  
FRIVOLOUS LAWSUIT  
FROM ALL OF US  
FROM THE BEACH  
FROM THE EDITOR  
FROM THE HEART  
FROM THE INSIDE OUT  
FROM THE SERENE TO THE EXTREME  
FROM ZERO TO A HERO  
FRONT OFFICE  
FROSTEC  
FRUIT DELICIOUS  
FT  
FUDGE A LITTLE  
FUEL THAT BODY  
FUGITIVE FINANCIER  
FULL COMPLIANCE  
FULL DISCLOSURE  
FULL MOON  
FULL OF LEGEND  
FULL THROTTLE TEST  
FULL WORKOUT  
FULL-BODY DEBAUCHERY  
FULL-BODY MASSAGE  
FULLY EQUIPPED  
FUN  
FUN AND EASY  
FUN AND FREE  
FUN EXPLOSION  
FUN FIX  
FUN FOR ALL  
FUN FOR BOYS & GIRLS  
FUN 'N GAMES  
FUN TO COOK  
FUN TO WATCH  
FUN, FASHION, FANTASY

FUNDAMENTALLY UNFAIR  
FUNNEL CLOUD  
FUNNY BONE  
FUNNY LINES  
FUS  
FUSION  
FUTURE  
FUTURE SHOCK  
FUTURISTIC WOMAN  
FX

G  
GAB  
GAILILEO  
GAIN A COMPETITIVE EDGE  
GAIN A WORKING KNOWLEDGE  
GALA  
GALACTIC  
GAME FUEL  
GAME PLAN  
GAME PLAYING  
GAME RESERVE  
GAME STATION  
GAME TIME  
GAMES RAFT  
GAMESO  
GARAGE  
GARDEN  
GARDEN LOVERS  
GARDEN OF THE DAY  
GARDENER  
GASPS OF AWE  
GASSER  
GEAR HEAD  
GEARING UP  
GELATO  
GEM OF THE OCEAN  
GEM STAR  
GEMINI AND APOLLO  
GEN  
GENE  
GENE THERAPY  
GENERAL KNOWLEDGE  
GENERAL RULE  
GENERAL RULE OF THUMB  
GENESIS  
GENETIC SPECIMEN  
GENETICALLY ALTERED  
GENETICALLY PROGRAMMED TO BEHAVE

GENGUARD  
GENTLEMEN ARE MAKING A COMEBACK  
GEO  
GEODIS  
GET A GRIP  
GET A LIFE  
GET A LITTLE WILD  
GET AROUND  
GET AWAY FROM IT ALL  
GET CLOSE  
GET COMFORTABLE  
GET CONNECTED  
GET DOWN  
GET GOOD  
GET HER ATTENTION  
GET HIP NOW  
GET HOOKED  
GET HOT AGAIN  
GET IN  
GET IN FOCUS  
GET IN SHAPE  
GET INSIDE  
GET INTO IT  
GET IT  
GET IT FIXED  
GET MORE THAN YOU EXPECT  
GET MOVING  
GET OFF  
GET ON YOUR FEET  
GET OUT  
GET OVER IT  
GET OVER THE HUMP  
GET OVER YOURSELF  
GET PAID WHAT YOU'RE WORTH  
GET PAST WHAT YOU HAVE HEARD  
GET PERSONAL  
GET PERSONAL WITH ME  
GET READY  
GET REAL  
GET RESULTS  
GET RICH SCHEME  
GET SAUCED  
GET SET TO HIKE  
GET SHINY  
GET THE EDGE  
GET THE HELL OUTTA THERE!  
GET THE PICTURE  
GET THEIR ATTENTION  
GET THEM WHERE WE WANT THEM  
GET THERE

GET THERE  
GET TIGHT  
GET TO THE GOAL  
GET TOGETHER  
GET USED TO WINNING  
GET WEALTHY  
GET YOUR KICKS  
GET YOUR REAR IN GEAR  
GET YOUR STORY STRAIGHT  
GETTING BACK INTO IT  
GETTING ENGAGED  
GETTING INTIMATE  
GETTING IT DONE  
GETTING IT ON  
GETTING NAKED  
GETTING RESULTS  
GETTING STARTED  
GETTING THERE  
GETTING TO KNOW YOU  
GETTING TO PARADISE IS EASY  
GHETTO  
GIANT  
GIFT OF LIFE  
GINGER BREAD  
GIRL NEXT DOOR  
GIRL POWER  
GIRL TALK  
GIRLIE TO GO  
GIRLIFE  
GIRLS LIKE IT  
GITI  
GIVE  
GIVE CREDIT WHERE CREDIT IS DUE  
GIVE 'EM OUR BEST  
GIVE IT  
GIVE IT ALL ACCESS  
GIVE IT AWAY  
GIVE IT TO THEM  
GIVE IT UP  
GIVE ME A BREAK  
GIVE ME THE CHILLS  
GIVE ME TIME  
GIVE ME YOUR HAND  
GIVE THEM WHAT THEY REALLY  
GIVE US A CLICK  
GIVE YOU A JOLT  
GIVING ME THE STRENGTH I NEED  
GLANCING BLOW  
GLEEFULLY PROFANE  
GLITTER GALORE

GLITTERING RECEPTION  
GLOBAL DRIVE  
GLOBAL GUEST  
GLOBE  
GLOSSY FACADE  
GLOWING PRAISE  
GLOWING WITH PRIDE  
GO "SITE" SEEING  
GO AHEAD  
GO FIGURE  
GO FOR BROKE  
GO FOR IT  
GO GIRLIE  
GO PACKING  
GO PUBLIC  
GO REMOTE  
GO STEADY  
GO TEAM  
GO THE DISTANCE  
GOAL LOVER  
GOAL ORIENTED  
GOALS CAN ALWAYS BE MET  
GOATRIDER  
GOD IS EVERY PLACE  
GOD SPEED YOUR LOVE TO ME  
GOIN' FISHIN'  
GOING ALL OUT  
GOING BACK TO  
GOING DOWN  
GOING FOR THE GOLD  
GOING FURTHER  
GOING GLOBAL  
GOING GLOSSY  
GOING LOCO  
GOING OFF THE DEEP END  
GOING PLACES  
GOING SOMEWHERE?  
GOING THROUGH A STAGE  
GOING TO HOLD YOUR BODY CLOSE  
GOING TO THE MOUNTAINS IS GOING HOME  
GOING WHERE NO CRESCENT WRENCH HAS GONE  
GOLD  
GOLD RUSH  
GOLD STANDARD  
GOLD TOOL  
GOLDEN GATE  
GOLDEN OPPORTUNITY  
GOLF IS THE GAME  
GONE FOREVER  
GOOD BALANCE IS ATTRIBUTABLE TO THE GRIP

GOOD CALL  
GOOD CHARACTER  
GOOD CLEAN FUN  
GOOD FIT  
GOOD FORTUNE  
GOOD GAME  
GOOD GIRL, BAD GIRL  
GOOD GIRLS DON'T  
GOOD GRADES  
GOOD GUY  
GOOD HEALTH  
GOOD IDEA  
GOOD LUCK  
GOOD LUCK CHARM  
GOOD MATCH  
GOOD NATURED  
GOOD NIGHT  
GOOD OLD DAYS  
GOOD SHOT  
GOOD STUFF  
GOOD THING  
GOOD WITH A BUN  
GOOGLE  
GORGEOUS VIEW  
GOT A MINUTE?  
GOT AWAY WITH MURDER  
GOT IT FIXED  
GOT IT WRONG  
GOT NAKED  
GOT TO DO IT MY WAY  
GOT TO FLY  
GOT TO HAVE IT  
GOTHAM FEST  
GOTTA HAVE IT  
GOTTA HAVE SWEET  
GOTTA KEEP DANCING  
GOURMET  
GRAND SCALE  
GRANDFATHER CLOCK  
GRANDKID  
GRANITE COAST  
GRASS ROOTS CLOUT  
GRASSLAND  
GRAVY TRAIN  
GREAT ADVENTURE  
GREAT ATHLETE  
GREAT BODIES WANTED  
GREAT BUILDINGS  
GREAT CHOICE  
GREAT EXPECTATIONS

GREAT GAME  
GREAT JOB!  
GREAT LAKES  
GREAT LAKES  
GREAT MINDS WANTED  
GREAT MOMENTS  
GREAT PERFORMANCE  
GREAT RESULTS  
GREAT SHAPE  
GREAT STRIDES  
GREAT STUFF  
GREAT TONE  
GREATEST AMERICAN HERO  
GREATEST HITS  
GREEN HILLS  
GREEN LIGHT  
GREEN MEANIES  
GREENSET  
GREEWICH  
GRID  
GRIM  
GRIN AND BEAR IT  
GROUND BREAKING EFFORT  
GROUND BREAKING WOMEN  
GROUND TRANSPORTATION  
GROUND ZERO  
GROUND ZERO  
GROUP WARE  
GROW TOGETHER  
GROW YOUR OWN TREE  
GROWING PAINS  
GROWING UP ISN'T EASY  
GRUISIN  
GS  
GUANO  
GUARANTEED BLISS  
GUEST SHOT  
GUETTO  
GUIDED BY HISTORY  
GUILT FREE  
GUILTY PLEASURE'S  
GUILTY VERDICT  
GUMBO  
GUN PLAY  
GUNNED  
GUS  
GUTS AND GLORY  
GUY'S GAL  
GW  
GYMNASTICS & DANCE

GYRO

HUNKIE ST  
HYPER-PENETRATION  
HAD NO REAL EFFECT ON YOUR LIFE  
HAIL TO THE CHIEF  
HAIR HELP  
HAIR PIN  
HALL OF FAME  
HALL ROLL CALL  
HALLEY'S  
HALTER TOP  
HAND STORY  
HAND-CRANK GENERATOR  
HANDLE WITH CARE  
HAND-ME-DOWNS  
HANDS ON  
HANDSHAKE  
HANDS-ON-WAY  
HANG IN THERE  
HANG ON  
HANG ON  
HANG TIME  
HANGING ON  
HANGING OUT  
HANGOUT GUY  
HANGUP  
HAPPENS EVERY DAY  
HAPPY  
HAPPY AT LAST  
HAPPY BUT UNHAPPY  
HAPPY HOUR  
HARBOR  
HARD ABS  
HARD BODY  
HARD LINE VIEW  
HARD TO PULL OFF  
HARD TO TOP  
HARD-DRIVEN  
HARDER, FASTER  
HARD-TO - FIND  
HARD-TO-REACH  
HARDWARE  
HARDY BEASTS  
HARMONY  
HAS BEFORE AND WILL AGAIN  
HAUL-A-WAY  
HAVE A BLAST  
HAVE GREAT EXPECTATIONS



HAVE I EVER LET YOU DOWN  
HAVE IT YOUR WAY  
HAVE MORE FUN  
HAVE WORTH TO ME ANYMORE  
HAVE YOU NO DECENCY  
HAVING A BAD DAY?  
HAVING A DREAM WHEN NO ONE HAS A HEART  
HAVING FUN  
HAVING IT ALL  
HE ACTED ALONG  
HE AIN'T BEEN OUT ALL DAY  
HE CHOSE A COURSE ALL HIS OWN  
HE INHALED, BUT HE DID NOT INHALE ENOUGH  
HE IS SCIENCE FICTION  
HE IS VERY GOOD AT WHAT HE DOES  
HE MAY HAVE TO SETTLE ON THE BRONZE  
HE MELTED  
HE WAS A NATURAL  
HEAD CASE  
HEAD FOR THE FORT  
HEAD HONCHO  
HEAD PRO  
HEAD TRIP  
HEADLINE ENTERTAINMENT  
HEAD-OVER-HEELS IN LOVE  
HEAD-TO-HEAD  
HEALTH  
HEALTH AND FITNESS  
HEALTH AND NUTRITION  
HEALTH IS WEALTH  
HEALTH NUT  
HEALTH TIPS  
HEALTHY AND BEAUTIFUL  
HEALTHY LIFESTYLE  
HEALTHY, SHINY AND STRONG  
HEART HOME  
HEART MAGIC  
HEARTBREAKER  
HEARTMAN  
HEAT INDEX  
HEAT WAVE  
HEAVENLY HARDWARE  
HEAVENLY SPIRIT  
HEAVY DRINKER  
HEAVY DRINKING  
HEAVY DUTY  
HEAVY DUTY ACTION  
HEAVY LIFTING  
HEAVY RAIN  
HEDGE YOUR BETS

HEIGHT OF FASHION  
HELD THE CROWD CAPTIVE  
HELL ON WHEELS  
HELLGATE  
HELLO LEGS  
HELLO, MY NAME IS  
HELL'S OWN RENEGADE  
HELP  
HELP YOURSELF  
HELPING OUT OTHERS  
HENRY  
HER ENERGY IS PHENOMENAL  
HER PASSION  
HER PRESENCE SCORCHED MY SKIN  
HERB  
HERB PLANET  
HERE IT IS!  
HERE TO HELP  
HERE TO SERVE  
HERE TO SOCIALIZE  
HERE'S HOW IT WORKS  
HERE'S LOOKING AT YOU  
HERE'S THE FUTURE  
HERO  
HERO WANTED  
HEROIN  
HE'S A LECHER  
HE'S HIS OWN GREATEST ASSET  
HE'S IN CHARGE  
HE'S THERE, YOU'RE BARE  
HE'S TOUGH  
HEY, DIDDLE DIDDLE  
HEY, HO! LET'S GO!  
HEY, WATCH THIS  
HI POWER  
HIA  
HIBERNATION  
HIDE AND SEEK  
HIDE IT  
HIDEAWAY  
HIFLOW  
HIGH ADVENTURE  
HIGH ALTITUDE  
HIGH DESERT  
HIGH MAGIC  
HIGH METABOLISM  
HIGH NOON  
HIGH PERFORMANCE  
HIGH SCORER  
HIGH SEAS

HIGH SPEED ACCESS  
HIGH SPEED ACTRESS  
HIGH STAKES  
HIGH STAKES CHESS GAME  
HIGH STAKES OFFER  
HIGH STAKES RISK  
HIGH TIDE  
HIGHER INCOME  
HIGHER LEARNING  
HIGHEST LEVEL  
HIGHEST STANDARDS  
HIGHLY ACCLAIMED  
HIGHLY INTELLIGENT  
HIGH-PROFILE  
HIGH-TECH WEAPON  
HIKING AND BIKING  
HILLSDALE  
HINDU GODDESS  
HINE  
HIP TIP HOW-TO  
HIPER  
HIRED GUN  
HIS DREAM GIRL  
HIS LEGACY IS UNEQUALED  
HIS MOST SECRET LOVE WISH  
HIS POINT OF VIEW  
HISTORIC AREA  
HISTORY BUFFS  
HISTORY IN BRONZE  
HISTORY OF THE MONTH  
HISTORY REPEATS ITSELF  
HIT A NERVE  
HIT AND RUN  
HIT IT A MILE  
HIT MAN  
HIT ON  
HIT OR MISS  
HIT SERIES  
HIT SONGS  
HIT THE BEACH  
HIT THE DECK  
HIT THE GYM  
HIT THE ROAD  
HIT THE ROAD RUNNING  
HIT THE SAUCE  
HITTING THE LAST BALL  
HITTING THE WALL  
HOLD ME IN YOUR ARMS  
HOLD ME SO YOU CAN'T LET GO  
HOLD NOTHING BACK

HOLD ON TO YOUR SEAT  
HOLD ON WITH BOTH HANDS  
HOLD THE MUSTARD  
HOLD TIGHT  
HOLD YOU IN MY ARMS FOREVER  
HOLD YOUR BODY CLOSE TO MINE  
HOLIDAY SEASON  
HOLIDAYS PAST  
HOLLAND  
HOLLOW WORDS  
HOLLYWOOD ENIGMA  
HOLLYWOOD IS FAKE  
HOLLYWOOD WEAR  
HOLLYWOOD'S OBSESSION  
HOME FIELD ADVANTAGE  
HOME GROWN TALENT  
HOME LIFE  
HOME OFFICE  
HOME TEAM  
HOME TO HOME  
HONEY DO  
HOOD  
HOORAY FOR OUR SIDE  
HOP N' POP  
HOP, SKIP AND A JUMP  
HOPE YOU ENJOYED YOUR DAY  
HORMONE-INDUCED COMA  
HORN  
HORNER  
HORSE LAUGH  
HOSPITALITY  
HOT AIR  
HOT AIR DOCTORATE  
HOT BEEF INJECTOR  
HOT BODIED  
HOT BODY  
HOT BOX  
HOT BUTTON  
HOT DATE  
HOT ENTRANCE  
HOT HOLLYWOOD CAREER  
HOT LEGS  
HOT LINKS  
HOT NEWS  
HOT PROJECT  
HOT SCOOP  
HOT STUFF  
HOT SUMMER ADVENTURE  
HOT TICKET  
HOT TIME

HOT TO TROT  
HOT TUB  
HOT WIRED  
HOT YOUNG ACTRESS  
HOTFOOTING IT  
HOTSPOT  
HOTTEST COLLECTION  
HOTTEST TALENT  
HOURGLASS BODY  
HOUSE  
HOUSE CAT KIND OF GUY  
HOW ABOUT GIRLS  
HOW ABOUT HERE?  
HOW ARE YOU FEELING?  
HOW CAN I GET STARTED?  
HOW CAN YOU LOSE?  
HOW CLOSE DO YOU GET?  
HOW COME YOU NEVER CALL?  
HOW COULD I HAVE KNOWN  
HOW COULD IT BE A CRIME TO BUY EARTH IN SLIME?  
HOW COULD YOU, I'M A WOMAN  
HOW DO I GET TO THE AIRPORT?  
HOW HOME IS MEANT TO BE  
HOW IT'S ALWAYS BEEN  
HOW MEAN CAN YOU BE?  
HOW MUCH ARE YOU WORTH?  
HOW MUCH DO YOU HAVE?  
HOW RISKY  
HOW THE WEST WAS WON  
HOW THE WINNERS DO IT  
HOW THINGS WERE  
HOW TO  
HOW TO BUILD A THERMONUCLEAR DEVICE  
HOW TO COMPLY  
HOW TO COPE  
HOW TO CORRECT IT  
HOW TO CREATE SPARKS  
HOW TO DO EVERYTHING BETTER  
HOW TO ENTER  
HOW TO GET STARTED  
HOW TO ORDER BY MALE  
HOW TO STRESS LESS  
HOW TO SURVIVE  
HOW TO WORK YOUR BODY  
HOW TO WRITE  
HOW WE FEEL  
HOW WE THINK  
HOW YOU SEE IT  
HPA  
HSC

HUG THE SHORELINE  
HUGGED THE CURVES  
HUMAN ACHIEVEMENT  
HUMAN RESOURCES  
HUNDRED  
HUNGER FOR GOD  
HUNGER FOR YOUR TOUCH  
HUNGRY FOR LIFE  
HUNKY AUSSIE  
HUNT  
HUNTING AT DUSK  
HURRICANE ALERT  
HURTS SO GOOD  
HUSK  
HUTCHISON  
HYBRID MONSTER  
HYDE  
HYPE R-ACTIV ITY  
HYPER  
HYPHEN  
HYPNOTIC EYES  
HYPNOTIZE THE ADDICTED

I AM A GOOD BOY  
I AM A LITTLE WEIRD  
I AM BEAUTIFUL  
I AM CAESAR  
I AM CONFIDENT  
I AM COUNTING ON YOU  
I AM FOREVER YOURS  
I AM GOING TO LEARN HOW TO FLY  
I AM GOING TO SEE YOU THIS AT COST  
I AM LOST IN MY EMOTION  
I AM NOT EXACTLY STABLE  
I AM SURE GOING TO MISS THAT GIRL  
I ARE WASTED  
I BELIEVE YOU KNOW MY CLIENT  
I CAN BARELY RECALL BUT IT'S ALL COMING BACK  
I CAN BECOME FAMOUS  
I CAN CATCH THE MOON IN MY HAND  
I CAN COUNT TO 100  
I CAN DO ANYTHING I PUT MY  
I CAN DO IT MYSELF  
I CAN FEEL MY BODY ROCK EV  
I CAN MAKE YOU GORGEOUS  
I CAN TRAIN ANYONE  
I CAN'T BELIEVE YOU'RE THAT STUPID  
I CAN'T HELP BUT LOVE YOU  
I CAN'T MEASURE MY LOVE  
I CARE HOW I LOOK ON YOU

I CONFESS  
I DON'T BELIEVE IN FEAR  
I DON'T CARE WHO YOU ARE  
I DON'T CONDONE IT  
I DON'T DESERVE LETHAL INJECTION  
I DON'T ENDORSE IT  
I DON'T HAVE A PROBLEM  
I DON'T KNOW  
I DON'T KNOW HOW TO LEAVE  
I DON'T KNOW WHAT TO SAY  
I DON'T KNOW WHY  
I DON'T MIND THE WORK  
I DON'T RENT, I OWN  
I DON'T RUN AWAY FROM BULLIES  
I DON'T THINK SO  
I DON'T WANT YOU TO SEE ME THIS WAY  
I DON'T WHIP HER WHEN SHE DOES SOMETHING WRONG, JUST  
SHE DOES SOMETHING RIGHT  
I DREAD THE MORNING LIGHT  
I DRIVE LIKE A STUNTMAN  
I EARNED THAT  
I FEEL GOOD  
I FEEL THE NIGHT EXPLODE WHEN WE'RE TOGETHER  
I FEEL TOTALLY REFRESHED  
I FINALLY FOUND SOMEONE  
I FIT IN  
I FOUND MR. RIGHT  
I GET PAID TO BREAK LEGS  
I GOT INTO IT GOT IT  
I GOT TO SEE YOU AGAIN  
I GUESS I'M EARLY  
I HAD IT ALL WHEN YOU WERE HERE  
I HATE MY BOSS  
I HATE TO EXERCISE  
I HAVE A GREAT IDEA  
I HAVE A LICENSE TO WEAR THIS  
I HAVE BEEN WAITING FOR YOU  
I HAVE DEVISED A PLAN  
I HAVE MORE BRAIN CELLS  
I HAVE NO PROBLEM WITH THAT  
I HAVE NOTHING TO HIDE  
I HAVE NOWHERE ELSE TO GO  
I HAVE WHAT YOU WANT  
I HAVE YET TO BE DISAPPOINTED  
I HAVEN'T HAD MUCH LUCK WITH WOMEN  
I HEAR AND OBEY  
I HEAR DADDY  
I HEARD A CALL AND I TOOK A FALL  
I HOPE THEY NEVER END THIS SONG  
I HOPE YOU KNOW WHAT YOU'RE DOING

I HUNGER FOR YOUR TOUCH  
I JUST BUSTED OUT  
I JUST WANT TO CELEBRATE  
I JUST WANT TO TELL YOU HOW I'M FEELING  
I KNEW IT WAS LOVE  
I KNOW JUST HOW TO FAKE IT  
I KNOW JUST HOW TO WHISPER  
I KNOW JUST WHERE TO TOUCH YOU  
I KNOW THE NIGHT IS FADING  
I KNOW THE WAY TO FAME  
I KNOW WHAT'S ON YOUR MIND  
I KNOW WHERE I'M GOING  
I KNOW WHO I WAS  
I LIKE A GOOD BACKSIDE  
I LIKE A GUY WHO KNOWS HOW TO HAVE A GOOD TIME  
I LIKE DRIVE-THRU  
I LIKE IT  
I LIKE TO COME WITH YOU  
I LOVE IT  
I LOVE WATCHING PEOPLE WATCH ART  
I LOVE YOU  
I MET SOMEONE  
I MUST TAKE DRASTIC MEASURE  
I NEED YOUR LOVE  
I NEED YOUR LOVE TO NIGHT  
I NEED YOUR LOVE TO SEE ME THROUGH  
I NEVER DO IT BETTER THEN WHEN I DO IT WITH YOU  
I NEVER DROP THE BALL  
I NEVER FELT LIKE THIS BEFORE  
I NEVER KNEW WHERE I CAME FROM  
I ONLY WORK HERE  
I PREFER THINGS A LITTLE LESS BORING  
I PUT ANTS IN HIS FOOD AND WATCHED HIM EAT IT  
I REALLY LIKE IT  
I REINVENTED MYSELF  
I RESCUE DAMSELS IN DISTRESS  
I RUINED HER RUG AND SHE HAS GIVEN ME THE FINAL HUG  
I SAW HER FIRST  
I SAY IT ONCE AGAIN, I LOVE YOU  
I SEE THE LIGHT  
I SEND THE SIGNAL  
I SET THE AGENDA  
I SHOW YOU FUNNY  
I STAYED OUT OF THAT ONE  
I STILL NEED YOU NEAR ME  
I TAKE YOU INTO THE NIGHT  
I TAMED A BUCKING BULL  
I TEACH ENGLISH AS A SECOND LANGUAGE  
I THINK YOU NEED AN ATTITUDE ADJUSTMENT  
I THOUGHT THEY WERE JUST GOOD FRIENDS



I TOOK ON A VOLCANO  
I WANT ONE LIKE THAT WHEN I GROW UP  
I WANT THE CORNER OFFICE  
I WANT TO BATHE WITH YOU IN THE SEA  
I WANT TO FEEL WHERE LOVE IS  
I WANT TO FIND THE PERFECT WOMAN AS SOON AS POSSIBL  
I WANT TO GET PHYSICAL  
I WANT TO KNOW FOR SURE  
I WANT TO KNOW WHERE LOVE IS  
I WANT TO LIVE FOREVER  
I WANT TO STAND WITH YOU ON A MOUNTAIN  
I WANT YOU TO KNOW  
I WANT YOU TO SHOW ME  
I WAS AS WRONG AS I COULD BE  
I WAS LOOKING FOR SOMETHING WITH MORE HORSEPOWER  
I WAS NOT SUPPOSED TO FALL IN LOVE WITH YOU  
I WAS NOT SUPPOSED TO LET THIS LOVE GET THROUGH  
I WAS READY TO GIVE UP EVERYTHING  
I WAS SAVING THAT FOR MY RETIREMENT  
I WILL BE RIGHT HERE WAITING FOR YOU  
I WILL GIVE YOU MY HEART UNTIL THE END OF TIME  
I WILL NOT GO QUIETLY  
I WILL SURVIVE  
I WISH I COULD HAVE DONE MORE  
I WISH I HAD MORE HELP  
I WISH I HAD MORE TIME  
I WISH THAT I HAD THAT GIRL  
I WONDER HOW WE CAN SURVIVE  
I WON'T DO ANYTHING YOU DON'T WANT ME TO DO  
I WOULD BE NOTHING WITHOUT YOU  
I WOULD DO ANYTHING FOR LOVE  
I WRITE ALOT  
I.D. CARD  
I.D. CONFIRMED  
ICE FISHING WINDOW  
ICING ON THE CAKE  
I'D LIKE MY LIFE BACK NOW, PLEASE  
IDEA  
IDEA LOCATION  
IDEAS ARE POWER  
IDOL CHATTER  
IDYLLIC VIEW  
IF BONES COULD TALK  
IF HE IS SANE, HE'S DANGEROUS  
IF I COULD  
IF I COULD FLY, I'D PICK YOU UP  
IF I WERE YOU  
IF IT DOES NOT EXIST, CREATE IT  
IF IT FEELS GOOD, DO IT  
IF IT FEELS GOOD, KEEP DOING IT

IF THERE WERE NO WORDS  
IF TIME IS MONEY, HOW MUCH MONEY DO YOU WASTE BY C  
LOST?  
IF WE SEE ME WALKING BY  
IF YOU CAN'T BEAT THEM, BUY THEM  
IF YOU CAN'T GET IN, YOU CAN'T INTERACT  
IF YOU COULD DREAM IT, YOU CAN LIVE IT  
IF YOU DARE  
IF YOU DO IT LIKE THIS  
IF YOU DON'T PUSH BEYOND IT, THERE'LL NEVER BE A BEYC  
IF YOU FORGIVE ME  
IF YOU LOVE HIM, HE WILL COME BACK  
IF YOU MESS UP, EVERYBODY PAYS  
IF YOU MESS WITH THE BULL,  
IF YOU MISS IT NOW, YOU WON'T HAVE IT LATER  
IF YOU RUN AWAY, YOU'RE PREY  
IF YOU THINK YOU CAN'T YOU NEVER EVER WILL  
IF YOU WANT THEM TO SURRENDER  
IF YOU'RE CALLING FROM A TOUCHTONE PHONE PRESS ONE  
IF YOU'RE NOT CAREFUL  
IF YOU'RE OVER 22, YOU'RE OVER THE HILL  
IF YOU'VE GOT IT, FLAUNT IT  
IGNITE  
IGNITE YOUR IMAGINATION  
IGNORANCE IS BLISS  
IGNORE HER  
IK  
IKON  
I'LL BE COMIN' HOME  
I'LL BE LONELY WITHOUT YOU  
I'LL BE RIGHT BACK  
I'LL BE THE JUDGE  
I'LL BE WAITING FOR YOU  
I'LL BE YOUR FANTASY  
I'LL DO ANYTHING  
I'LL GET TO YOU SOMEHOW  
I'LL GIVE YOU A HINT  
I'LL HAVE YOUR LICENSE REVOKED  
I'LL KEEP IT IN MIND  
I'LL NEVER BREAK YOUR HEART  
I'LL NEVER LET YOU GO  
I'LL NEVER MAKE YOU CRY  
I'LL SHOW YOU LOVE LIKE YOU'VE NEVER SEEN  
I'LL TAKE WHAT'S INSIDE  
I'LL TAKE YOU INTO THE NIGHT  
I'M 10 I.Q. POINTS BELOW EINSTEIN  
I'M A HERO  
I'M A HOBO  
I'M A LITTLE SHY  
I'M A REDNECK

I'M ALL ALONE  
I'M AN EXCHANGE STUDENT  
I'M EASY  
I'M FLATTERED  
I'M GLAD TO BE HERE  
I'M GOING TO HOLD YOU IN MY ARMS FOREVER  
I'M GOING TO MAKE IT TO HEAVEN  
I'M HAPPY FOR YOU  
I'M IN A BETTER MOOD ALREADY  
I'M IN A HURRY  
I'M IN LOVE AGAIN  
I'M IN NO RUSH  
I'M JUST LOOKING FOR A CHICK TO HANG OUT WITH  
I'M JUST TRYING TO FIGURE IT ALL OUT  
I'M KNOWN FOR BEING HANDS-ON  
I'M LEAVING MY LIFE IN YOUR HANDS  
I'M LEAVING, I MUST  
I'M LIVING ON THE EDGE  
I'M NEVER GOING TO LET YOU GO  
I'M NOT AFRAID OF A FIGHT  
I'M NOT ALL THERE  
I'M NOT INTO DATING  
I'M NOT LIKE OTHER PEOPLE, I CAN STAND PAIN  
I'M NOT MAD  
I'M READY  
I'M THE BROAD SKETCHY OUTLINE  
I'M THE ONE WHO LOVES YOU MORE  
I'M THE ONE WHO LOVES YOU SO  
I'M TOUGH  
I'M UPSIDE DOWN  
I'M VULNERABLE  
IMAGE RESOURCE  
IMAGEPOINT  
IMAGINATION OVER BUDGET  
IMAGINE GETTING MORE  
IMIX  
IMMERSE YOURSELF  
IMPACT PLAYER  
IMPERIAL  
IMPETUOUS BEHAVIOR  
IMPRESS HER FOREVER  
IMPRESSION  
IMPRESSIVE LANDMARKS  
IMPROVE BODY ALIGNMENT  
IMPROVE YOUR VIEW  
IMPROVED TEXTURE  
IMPROVES YOUR ODDS  
IN 45 SECONDS IT WAS ALL OVER  
IN A CLASS BY ITSELF  
IN A JAM

IN A LEAGUE OF MY OWN  
IN A MANNER OF SPEAKING  
IN A NUTSHELL  
IN A PAST LIFE  
IN A PERFECT WORLD  
IN AND OUT OF THE SACK  
IN CAPSULE  
IN CHARGE OF YOUR OWN FATE  
IN DEMAND  
IN DENIAL  
IN DEVELOPMENT  
IN FOR A SHOCK  
IN GOOD HANDS  
IN HIS OWN WORDS  
IN JEST  
IN JUST MOMENTS  
IN LOVE WITH LIFE  
IN MINT CONDITION  
IN MORE WAYS THAN ONE  
IN MY OPINION  
IN NATURE THINGS MOVE FOR A REASON  
IN NATURE THINGS MOVE FOR A REASON  
IN PLAIN ENGLISH  
IN PURSUIT OF PLEASURE  
IN REALITY  
IN SEARCH OF  
IN SEARCH OF WATER  
IN STYLE  
IN THE BAG  
IN THE CROWD  
IN THE DARK  
IN THE DEAD OF NIGHT  
IN THE FLESH  
IN THE FRONT ROLE  
IN THE GAME  
IN THE NIGHT  
IN THE SPRING  
IN THE SWIM  
IN THE WORKS  
IN TIME FOR ARMAGEDDON  
IN TUNE WITH YOUR BENEFITS  
IN YOUR EYES  
IN-CHARGE GUY  
INCRIMINATING EVIDENCE  
IND  
INDEPENDENT FILM SNOB  
INDIA  
INDOOR I OUTDOOR  
INDULGE YOUR PASSION  
INDULGE YOUR SENSES

INDULGE YOURSELF  
INFINITE FUEL  
INFLAME THE EVENING  
INFLUENCED BY A HIGHER POWER  
INFORM  
INFORMATION NEVER SLEEPS  
INFORMATION OVERLOAD  
IN-HOME TRIAL  
INK TO INTERNET  
IN-LINE SKATING  
INNER TURMOIL  
INS AND OUTS  
INSATIABLE APPETITE  
INSIDE  
INSIDE INFORMATION  
INSIDE STORY  
INSIDE YOUR LOCKER  
INSIDERS SAY  
INSIGHT  
INSIGHTFUL, NAIVE, BUT INSIGHTFUL  
INSPIRATION, NOT PERSPIRATION  
INSPIRE SMILES  
INSPIRED BY FANTASY  
INSPIRED MADNESS  
INSTANT ACCESS  
INSTANT COOL  
INSTANT ENERGY  
INSTANT FUN  
INSTANT GRATIFICATION  
INTELLECTUAL CAPITOL  
INTELLECTUAL HARVEST  
INTELLIGENT  
INTELLIGENT LIFE  
INTENSITY GROWS  
INTENSITY OF PLEASURE  
INTERIM  
INTERNAL DOCUMENT  
INTERNAL FIGHTING  
INTERNET  
INTERNET ADDICTION  
INTIMATE ALTERNATIVE  
INTIMATE ENCOUNTERS  
INTIMATE LUNCHEON  
INTIMATE SPACE  
INTIMATE STRANGERS  
INTRIGUING POSSIBILITY  
INTRUDE  
INVESTIGATOR  
INVITATION ONLY  
IOSONO

IPOLAR  
IPSEN  
IQ  
IRISH BEAUTY  
IRON GIRL  
IRON STOMACH  
IRRATIONAL FEAR  
IRRESISTIBLE FLAIR  
IS ANYONE OUT THERE?  
IS IN HIGH DEMAND  
IS IT WORTH IT?  
IS SHE REALLY GOING OUT WITH HIM?  
IS THAT YOU?  
IS THERE ANYTHING TO DO AT NITE?  
IS THIS ANYWAY TO CONDUCT BUSINESS?  
IS THIS REALLY ALL THERE IS?  
ISLAND LEGEND  
ISLAND RESORT  
ISLES OF PARADISE  
ISN'T AMERICA GREAT!  
ISOTONIC  
IT ALL GOES  
IT ALL STARTS HERE  
IT ALL STARTS WITH A PHONE CALL  
IT ALWAYS BLOWS ME AWAY HOW LEAN AND TIGHT IT IS  
IT BEGINS AT THE BOTTOM OF THE SEA  
IT CAN'T BE BUT IT IS  
IT CASTS  
IT COULDN'T BE EASIER  
IT HAPPENED  
IT HAPPENS HERE!  
IT HAS A PURPOSE  
IT HAS PAID OFF  
IT IS AN ILLUSION  
IT IS NOT ENOUGH THAT I MUST SUCCEED EVERYONE ELSE I  
FAIL  
IT IS NOW SIMPLER  
IT IS SO DIFFICULT TO COMMUNICATE  
IT ISN'T OVER UNTIL IT'S OVER  
IT JUST DOESN'T GET ANY SWEETER  
IT MAKES SENSE  
IT NEVER TASTED SO GOOD  
IT PAYS TO ASK  
IT RULES YOUR LIFE  
IT SATISFIES  
IT SEEMS BIG  
IT STIMULATES THE HEART  
IT TASTES BETTER  
IT TONES AND ELONGATES EVERY MUSCLE  
IT WAS HIM OR ME

IT WAS SO LONG AGO BUT IT'S ALL COMING BACK  
IT WILL NEVER BE ORDINARY AGAIN  
IT WILL NEVER BE THE WAY IT USED TO BE  
IT WILL STRIKE FEAR INTO THE HEART OF BOREDOM  
IT WON'T BE THE FIRST TIME  
IT WON'T BREAK THE BANK  
IT WORKS  
IT WORKS UNLIKE ANYTHING ELSE  
IT'S A CALLING  
IT'S A CLEAN SWEEP  
IT'S A DOG'S LIFE  
IT'S A FACT  
IT'S A FAMILIAR STORY  
IT'S A GREAT PLACE  
IT'S A HORROR FILM  
IT'S A KICK IN THE MOUTH  
IT'S A LOT OF FUN  
IT'S A PREDATORY WORLD  
IT'S A PRIVILEGE TO SERVE YOU  
IT'S A REAL SPORT  
IT'S A TRAP!  
IT'S A WHOLE NEW BALL GAME  
IT'S A WHOPPER  
IT'S ABOUT LOVE  
IT'S ABOUT TIME  
IT'S ALL HAPPENING OVERNIGHT  
IT'S ALL IN THE WRISTS  
IT'S AN EXPERIENCE TO REMEMBER  
IT'S AS EASY AS 1, 2, 3  
IT'S BACK  
IT'S BIG TIME  
IT'S BUYING TIME  
IT'S COMPLETELY NAKED  
IT'S DOABLE  
IT'S EASIER TO GET WHERE IT'S SUPPOSED TO  
IT'S EASY  
IT'S FUN WATCHING  
IT'S GOOD FOR BUSINESS  
IT'S GOOD TO HAVE A MYSTERY GOING ON  
IT'S GOT TO BE YOU  
IT'S HAD TIME TO GROW  
IT'S HARD TO BELIEVE  
IT'S HEART-HEALTHY  
IT'S HERE  
IT'S IN THE BAG  
IT'S JUST AS IMPORTANT TO TRAIN THE OWNER AS THE DOG  
IT'S LIKE HAVING A DREAM  
IT'S LIKE HAVING IT ALL  
IT'S MILLENNIUM TIME!  
IT'S MORE FUN AT THE TOP

IT'S MORE THAN FUN  
IT'S MY PLAN  
IT'S MY WORLD, YOU'RE WELCOME TO IT  
IT'S NOBODY'S BUSINESS  
IT'S NOT A BEEPER  
IT'S NOT CODE, IT'S DRIBBLE  
IT'S NOT COMING BACK  
IT'S NOT JUST ABOUT SEX  
IT'S NOT NATURAL  
IT'S NOT ROCKET SCIENCE  
IT'S NOT THE GUN, IT'S THE REASON WHY THE PERSON PICKS  
GUN  
IT'S NOT THE SAME TO TALK OF BULLS, AS IT IS TO BE IN THE  
RING  
IT'S NOT YOUR FAULT  
IT'S ONLY  
IT'S OVER IT'S PAYBACK TIME  
IT'S PART OF HIM  
IT'S PERFECTLY SAVE FOR DROIDS  
IT'S REALLY NO BIG DEAL  
IT'S REALLY YOUR CALL  
IT'S SELDOM AS GOOD AS IT LOOKS  
IT'S SEX, SPEED, ADVENTURE, MONEY AND FUN  
IT'S SO HARD TO BELIEVE THAT IT'S ALL COMING BACK  
IT'S SUPPOSED TO BE FUN  
IT'S THE THOUGHT THAT COUNTS  
IT'S TIME FOR BED  
IT'S TIME TO BRING THE CUP BACK HOME  
IT'S TIME TO GROW UP  
IT'S TIME TO LET GO  
IT'S TIME TO PUT THE TEACHER TO THE TEST  
IT'S TIME TO SET SAIL  
IT'S TIME TO TALK  
IT'S TOO STRONG  
IT'S UP, IT'S DOWN  
IT'S WHAT'S INSIDE  
IT'S YOU, BABE  
IT'S YOUR CALL  
ITSY BITSY  
I'VE ALWAYS CAST AS A REBEL  
I'VE BEEN BAD ALOT  
I'VE DISCOVERED A CURE FOR ALL AILMENTS KNOWN TO M  
I'VE DREAMED OF THIS A THOUSAND TIMES  
I'VE NEVER BEEN TO A ROCK CONCERT  
IVY





Webmaster

# **EXHIBIT N**

**UNITED STATES PATENT AND TRADEMARK OFFICE**  
**Trademark Trial and Appeal Board**  
**P.O. Box 1451**  
**Alexandria, VA 22313-1451**

Baxley

Mailed: July 30, 2006

Opposition No. 91170256

Central Mfg. Co. (Inc.)

v.

Google Inc.

**By the Trademark Trial and Appeal Board:**

Involved application Serial No. 76314811 was published for opposition on November 1, 2005.

Opposer Central Mfg. Co. (Inc.) filed a request to extend time to oppose by ninety days on November 27, 2005, which the Board granted on November 28, 2005. By such extension, opposer was allowed until March 1, 2006 to file a notice of opposition. Opposer filed a notice of opposition on March 1, 2006, and the Board issued a notice instituting this proceeding on April 8, 2006.

In an order signed by the Chief Administrative Trademark Judge on July 14, 2006, all extensions of time filed during and since November 2005 by Leo Stoller and the entities controlled by him, including opposer, were vacated as a sanction. See attached Order.

Accordingly, the extension of time to oppose the involved application that the Board granted on November 28,

2005 is vacated, and the notice of opposition is thus untimely. Based on the foregoing, the above-captioned opposition is dismissed.<sup>1</sup>

Application Serial No. 76314811 will proceed to issuance of a registration certificate in due course.

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<sup>1</sup> All pending motions in this proceeding are moot.

**UNITED STATES PATENT AND TRADEMARK  
OFFICE**

Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

July 14, 2006

Leo Stoller  
7115 W. North Avenue #272  
Oak Park, Illinois 60302

Dear Mr. Stoller:

By order dated March 28, 2006, you were informed that the United States Patent and Trademark Office (USPTO) was considering imposing sanctions against you under 37 C.F.R. §10.18(c),<sup>1</sup> and you were allowed thirty days in which to show cause why sanctions should not be imposed. On April 26, 2006, after an extension of time to respond was granted, you filed your response to the order to show cause.

**BACKGROUND**

**Summary of the March 28, 2006 show cause order**

The show cause order noted that you and entities you control filed more than 1100 requests for extension of time to file notices of opposition between November 2005 and March 2006. The order noted, further, that the sheer number of such filings by one person is unprecedented and raises serious questions about whether the filings were undertaken for an improper purpose in violation of 37 C.F.R. § 10.18(b)(2), such as for harassment or unnecessary delay of the targeted applications.

The show cause order made reference to the numerous sanctions imposed on you, over many years, in past TTAB proceedings as evidence of your pattern of misconduct and abuse of the TTAB's

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<sup>1</sup> The authority to impose sanctions under 37 C.F.R. §10.18(c) has been delegated to the Chief Administrative Trademark Judge from the General Counsel under authority delegated to him by the Under Secretary of Commerce and Director of the United States Patent and Trademark Office.

processes.<sup>2</sup> The show cause order alluded also to your conduct in Federal court proceedings that resulted in negative comment, chastisement, and the imposition of sanctions. In light of your well-documented history, it was concluded that you most likely had an improper purpose in filing such an extraordinary number of extensions of time to oppose.

You were instructed specifically that your response to the show cause order include, for each of the marks for which you requested an extension of time to file an opposition, evidence

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<sup>2</sup> In particular, the following cases were cited in the show cause order: *S. Indus. v. Lamb-Weston, Inc.*, 45 USPQ2d 1293 (TTAB 1997) (submission of fraudulent certificate of mailing and certificate of service); *S Indus. v. S&W Sign Co.*, Opp. No. 91102907 (Dec. 16, 1999) (fraudulent allegations of ongoing settlement negotiations; allegations of non-receipt of papers found not credible); *Central Mfg. Inc. v. Third Millennium Technology, Inc.*, 61 USPQ2d 1210 (TTAB 2001) (submission of false statements in order to secure extension of time to oppose); *S Indus., Inc. v. Casablanca Indus., Inc.*, Canc. No. 92024330 (Oct. 3, 2000) (dilatatory tactics throughout proceeding); *Central Mfg., Inc. v. Flex-Coil Ltd.*, Opp. No. 91117069 (Feb. 19, 2002) ("opposer's representative has filed ... numerous papers [for] the sole purpose of harassing applicant, apparently until it capitulates"); *Bacu USA Safety, Inc. v. Central Mfg. Co.*, Canc. No. 92032631 (Jul 24, 2003) ("respondent has ... failed to show cause why sanctions should not be imposed on it for filing the groundless Rule 11 motion, [and] has ... compounded its wrong by filing a groundless motion for reconsideration"); *S Indus. v. JL Audio, Inc.*, Opp. No. 91110672 (May 13, 2003) (finding opposers' claim "without exception, completely devoid of merit"; opposers engaged in "a pattern of voluminous and piece-meal motion practice against which [they] were warned"); *Central Mfg. Co. V. Astec Indus., Inc.*, Opp. No. 91116821 (Sept. 3, 2003) (judgment entered against opposer for filing abusive Rule 11 motions); *Central Mfg. Co. V. Medtronic Sofamor Danek, Inc.*, Opp. Nos. 91154585, 91154617 (Feb. 19, 2004) (sanctions imposed for filing meritless motions for the purpose of harassment and delay); *Central Mfg. Co. v. Premium Prods. Co.*, Opp. No. 91159950 (Sep. 29, 2004) (sanctions granted for opposer's bad faith omission of date from metered mail); *Leo Stoller v. Northern Telepresence Corp.*, Opp. No. 91162195 (Feb. 11, 2005) (Board found that opposer had submitted untimely extensions of time to oppose notwithstanding use of certificates of mailing and declarations to the contrary; opposition dismissed); *Bacu USA Safety, Inc. v. S Indus., Inc.*, Opp. No. 91108769 (Aug. 14, 2002) ("applicant's pattern of behavior ... reveals a deliberate strategy of delay, evasion and harassment ..., implied threats to the Commissioner, and ... a direct violation of a Board order").

that supports a claim that you may be damaged by registration of the mark.

Finally, you were informed that the sanctions being considered included terminating or vacating any extension of time to oppose found to have been filed in violation of the applicable rules, restriction of your right to appear before the USPTO on your own behalf or as an officer, director, or partner of any entity you control, and/or restriction of your right to request extensions of time to oppose on behalf of yourself or any entity you control.

#### **Summary of Response**

Your four-page response, to which you attached many pages of exhibits, consists of quotations from the show cause order, citation to certain cases to which you were a party and in which no sanctions were imposed on you, coupled with a request that the USPTO not impose any sanctions based on your past practices before the TTAB and other tribunals, and general comments concerning your basis for filing the numerous requests for extensions of time to oppose, without mention of any particular request.

#### ***References to Other Proceedings***

In asking that the USPTO not sanction you for your past conduct in TTAB cases and the cases in other tribunals, you point out that the Executive Committee for the federal judicial district of the Northern District of Illinois issued you a citation on December 15, 2005, allowing you time to show cause why "reasonable and necessary restraints" should not be imposed upon you in view of your activities in the lawsuits brought by you or your wholly-owned companies, before the Court. The Executive Committee quoted Judge Coar in *Central Mfg. Co. v. Brett*,<sup>3</sup> 78 USPQ2d 1662, 1664 (N.D. Ill. 2005) as follows:

Indeed, as several judges (including this one) have previously noted, Stoller appears to be running an industry that produces often spurious, vexatious, and harassing federal litigation ... Plaintiff and one or more of his corporate entities have been involved in at least 49 cases

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<sup>3</sup> The Executive Committee referenced the case as: Case No. 04 C 3049, *Stealth Ind. Inc. v. George Brett & Brett*.

in this district alone. Of these, at least 47 purport to involve trademark infringement ... No court has ever found infringement in any trademark allegedly held by Stoller or his related companies in any reported opinion.

You also noted that, after filing your response, the Executive Committee ruled, without further explanation, as follows:

The Executive Committee of the Northern District of Illinois has considered your response to the citation issued to you on December 15, 2005. After discussion, the Committee will take no further action in this matter.

You then referred to an order in *Leo Stoller d/b/a Central Mfg. Co. v. WFJM Enterprises, Inc.*, Opposition No. 91155814 (TTAB May 5, 2004), in which the TTAB denied, as premature, a motion to impose sanctions on you.

Finally, in asking that the USPTO not sanction you for your past conduct, you refer to the "*S Industries v. Genie Door*"<sup>4</sup> case wherein the now Chief Judge of the Northern District of Illinois declined, eight years ago, to impose sanctions stating, in part, "the court, however, cannot base its decision to award fees on the plaintiff's conduct in other cases with other defendants."<sup>5</sup>

#### ***Comments Regarding Current Extension Requests***

You assert that none of the extensions that you have filed on your own behalf or on behalf of entities you control was made for any improper purpose or for harassment or delay. The show cause order specifically required you to provide, for each of the marks for which you have requested an extension of time to oppose, evidence supporting a claim that you may be damaged by registration of the mark. In response, you assert that you have met the standard for filing an extension of time to oppose, because all such extension requests "are not based upon the potential opposer being damaged by a registration, but are based upon the potential opposer merely having an opportunity to

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<sup>4</sup> The copy of the order provided with your response did not include the caption of the case. It appears that the correct designation of the case is *S Industries, Inc. v. GMI Holdings, Inc.*, Case No. 96 C 2232 (N.D. Ill. 1998).

<sup>5</sup> While the Court did not award fees to defendant (GMI), the Court did award costs to defendant.



investigate the facts, obtain documentation, and to enable the potential opposer to consider its position with regard to potential opposition of an application." You did not provide information regarding any specific steps you have taken with regard to any application for which you have obtained an extension of time to conduct such an investigation.

With respect to the requirement that you support your claim of damage, you state that, through entities which you control, you "hold rights to over 100 Federal Trademark Registrations" and hold "Common Law rights to several thousand trademarks and slogans which can be found at [www.rentamark.com](http://www.rentamark.com)." You submitted, as exhibits, excerpts from the referenced website, including a "list of emarks" to which you claim rights. You state that, for each extension filed, you relied on common law rights to a trademark that was, in your opinion, confusingly similar to the applicant's mark.<sup>6</sup>

In requesting that you not be sanctioned, you ask that the USPTO merely give you "... some direction to keep Leo Stoller on a proper course..."

#### **Activities Since Issuance of the Show Cause Order**

Since the date of the show cause order, you have filed requests for extension of time to oppose against more than 400 additional applications, bringing the total since November 2005 to over 1800, as compared to only six you filed in the five-month period between June and October 2005. In particular, USPTO records show that during the past year you have filed requests for extension of time to oppose as follows:

<b>June 2005</b>	<b>1</b>
<b>September 2005</b>	<b>3</b>
<b>October 2005</b>	<b>2</b>
<b>November 2005</b>	<b>47</b>
<b>December 2005</b>	<b>238</b>

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<sup>6</sup> "For each of the extensions that Leo Stoller filed, Leo Stoller held Common Law rights to a trademark that was in Leo Stoller's opinion, confusingly similar to the *potential opposer's* mark." (Emphasis added.) It is assumed that your reference to "potential opposer's mark" was intended, rather, as a reference to the marks against which you filed the extension requests.

January 2006	188
February 2006	151
March 2006	717
April 2006	423
May 2006	63
<b>Total</b>	<b>1,833</b>

In your response to the show cause order, you stated that you had ceased filing extensions of time to oppose in those cases in which you would have relied on your alleged common law rights. It appears that you have done so.

Since the issuance of the order to show cause, you have contacted directly at least some of the applicants whose applications are the subjects of your requests to extend time to oppose. The TTAB has received informal complaints, formal requests for reconsideration of certain, specific extension requests, and at least one objection to the granting of any more extension requests. The nature of your contact, according to the applicant for application Serial No. 76616350, was "a large package of materials requesting money" in exchange for settlement.<sup>7</sup> Apart from their substantive content, your contact letters request that the receiving applicant consent to an additional 90-day extension of time to oppose, further informing the addressee that such consent will be assumed if you do not hear from the applicant by a date certain and that you will file a "stipulated" request for an additional 90-day extension.<sup>8</sup>

#### APPLICABLE RULES

<sup>7</sup> Contacting your potential adversary is not *per se* prohibited conduct. Indeed, many potential opposers do so in order to explore the possibility of initiating good faith, bilateral settlement discussion. Inasmuch as the substance of your contact is being addressed separately in connection with the requests being filed by the applicants who have taken formal steps to seek redress, the USPTO will not discuss in detail the "large package of materials" and other features of the contact letter.

<sup>8</sup> Under TTAB rules, you would not be permitted an additional 90-day extension after receiving a first 90-day extension. "After receiving one or two extensions of time totaling ninety days, a person may file one final request for an extension of time for an additional sixty days....No further extensions of time to file an opposition will be granted under any circumstances." Trademark Rule 2.102(c)(3); 37 C.F.R. §2.102(c)(3).

Trademark Rule 2.102 provides, in relevant part, for the filing of requests to extend the time to oppose as follows:

(a) Any person who believes that ... it would be damaged by the registration of a mark on the Principal Register may file ... a written request ... to extend the time for filing an opposition. ... Electronic signatures pursuant to § 2.193(c)(1)(iii) are required for electronically filed extension requests.

(c) ... Requests to extend the time for filing an opposition must be filed as follows:

(1) A person may file a first request for either a thirty-day extension of time, which will be granted upon request, or a ninety-day extension of time, which will be granted only for good cause shown.

Trademark Rule 2.193(c)(2) provides in relevant part as follows:

The presentation to the Office (whether by signing, filing, submitting, or later advocating) of any document by a party, whether a practitioner or non-practitioner, constitutes a certification under § 10.18(b) of this chapter. Violations of § 10.18(b)(2) of this chapter by a party, whether a practitioner or non-practitioner, may result in the imposition of sanctions under § 10.18(c) of this chapter.

Patent and Trademark Office Rule 10.18 provides as follows:

(b) By presenting to the Office (whether by signing, filing, submitting, or later advocating) any paper, the party presenting such paper, whether a practitioner or non-practitioner, is certifying that-

(2) To the best of the party's knowledge, information and belief, formed after an inquiry reasonable under the circumstances, that- (i) The paper is not being presented for any improper purpose, such as to harass someone or to cause unnecessary delay or needless increase in the cost of prosecution before the Office; (ii) The claims and other legal contentions therein are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal

of existing law or the establishment of new law; (iii) The allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and (iv) The denials of factual contentions are warranted on the evidence, or if specifically so identified, are reasonably based on a lack of information or belief.

(c) Violations of paragraph (b) (1) of this section by a practitioner or non-practitioner may jeopardize the validity of the application or document, or the validity or enforceability of any patent, trademark registration, or certificate resulting therefrom. Violations of any of paragraphs (b) (2) (i) through (iv) of this section are, after notice and reasonable opportunity to respond, subject to such sanctions as deemed appropriate by the Commissioner, or the Commissioner's designee, which may include, but are not limited to, any combination of-

- (1) Holding certain facts to have been established;
- (2) Returning papers;
- (3) Precluding a party from filing a paper, or presenting or contesting an issue;
- (4) Imposing a monetary sanction;
- ...
- (6) Terminating the proceedings in the Patent and Trademark Office.

#### DISCUSSION

Your assertion that you have met the standard for filing requests for extension of time to oppose and that you need not submit evidence supporting a claim that you may be damaged by registration of the marks in the subject applications amounts to a failure to respond meaningfully to the show cause order. While an unchallenged request for extension of time to oppose, when accompanied by a minimal statement of good cause, is rarely

denied,<sup>9</sup> your filing of more than 1100 requests for extension of time to oppose within the few months preceding the date of the show cause order suggested a serious violation of your responsibilities as a party before the USPTO. The show cause order thus required you to demonstrate more than what might have been required in the ordinary case to support a single request for extension of time. In particular, you were required to demonstrate that the extension requests were not filed for improper purposes but, instead, were based on cognizable rights you may have arising under the Trademark Act.

Addressing directly the issue of your belief that you will be damaged, you indicate that you own over 100 federal registrations for trademarks and that you have common law rights in several thousand trademarks and slogans, referring to your website and attaching pages from your website to your response. Your submissions do not substantiate your rights in any of the claimed marks, let alone support a colorable claim of damage. For example, you did not submit copies of the registration certificates of the registered trademarks you claim to own. Nor did you even clearly identify your registered trademarks and the goods and services for which they are registered.

In support of your claim of damage to your purported common law trademarks, you provided a listing of your claimed trademarks, running to almost 150 pages (50 terms listed on each page). The listing was derived from your website and includes nothing more than the listing of the marks themselves. You submitted no evidence of products or services bearing these alleged marks, no evidence that you have sold any products or services under these marks, and no evidence of your advertising of goods or services with these marks.

At your website, you offer to "RENT-A-FAMOUS slogan" and offer "Famous Trademarks for Rent On-Line." Your website states that you "control over 10,000 famous trademarks...." Nonetheless, the exhibits from your website do not demonstrate your offering for sale any goods or services, other than the "rental" of the marks themselves, nor do the website exhibits demonstrate the use of any of the asserted terms as trademarks. These excerpts from your website, rather than evidencing support of any purported claim for damage, reinforce the conclusion that you are holding up thousands of applications in an attempt to coerce applicants

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<sup>9</sup> But see, TBMP § 210, 211 (2d ed. rev. 2004) (regarding requests by applicants that the TTAB reconsider granted requests for extensions of time to oppose or deny subsequent requests).

to license, i.e., "rent," trademarks to which you have not demonstrated any proprietary right. Cf. *Central Mfg. Co. v. Brett*, 78 USPQ2d 1662, 1675 (N.D. Ill. 2005) ("Leo Stoller and his companies present paradigmatic examples of litigants in the business of bringing oppressive litigation designed to extract settlement.")

Finally, in requesting that the USPTO not sanction you for your past conduct, you reference in your response two court cases and a single TTAB case in which sanctions were not imposed on you. Although these other tribunals have for various reasons declined to impose sanctions, their decisions also contain findings supporting the conclusion that your recent activities in the TTAB are not isolated or anomalous, but rather reflect a pattern of harassing behavior. The rationales used by those other tribunals for declining to impose sanctions do not apply here, where the behavior is of such a systematic nature as to raise the potential cost of seeking a trademark for the public generally.

#### DETERMINATION

Your filing of an extraordinary number of requests for extension of time to oppose, particularly in light of your past behavior before the TTAB and the courts, constitutes a violation of your responsibilities under Patent and Trademark Rule 10.18(b). That rule provides that, by filing a paper (including the extension requests at issue here), you represent, among other things, that "[t]he paper is not being presented for any improper purpose, such as to harass someone or to cause unnecessary delay or needless increase in the cost of prosecution before the Office" and that "[t]he claims and other legal contentions therein are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law." Patent and Trademark Rule 10.18(b)(2).

Extensions of time to oppose are granted *ex parte*, typically upon a minimal showing of good cause. Nonetheless, the requirements for an extension of time to oppose are clear: "Any person *who believes that he, she or it would be damaged by the registration of a mark ... may file in the Office a written request ... to extend the time for filing an opposition.*" Trademark Rule 2.102(a) (emphasis added). Thus, while the potential opposer's showing

need not be extensive and the TTAB's examination of extension requests is usually cursory, Trademark Rule 2.102 and Patent and Trademark Rule 10.18 require that all requests for extension of time be based on a good faith belief that the potential opposer would be damaged by the potential registration.

The show cause order invited you to demonstrate that your filing of each of the extraordinary number of requests for extension of time to oppose was not improper. ("Any such showing should include evidence that supports a claim that you may be damaged by the registration of each of the marks for which an extension of time to oppose has been filed.") While extensions of time to investigate potential claims are common, the potential opposer must still hold some reasonable belief that it would be damaged by registration of the mark in question. Notwithstanding the opportunity offered to you to demonstrate such a belief, you have declined to make any such showing.

Any impropriety with respect to the letters you have sent to applicants against whose applications you have filed requests to extend time to oppose is not now under review. Nonetheless, the manner in which you request "consent" for prospective further requests to extend time to oppose, such consent being necessary under Trademark Rule 2.102(c)(3), is indicative of your motivation in filing the requests to extend time to oppose that are now under scrutiny. Specifically, your intimation that the individual applicant's consent is presumed if you do not receive an objection is in contradiction of your actual knowledge that any such consent must be explicit. See *Central Manufacturing, Inc. v. Third Millennium Technology, Inc.*, 61 USPQ2d 1210 (TTAB 2001) (misrepresenting that applicant has "agreed" to the third and fourth requests to extend time to oppose). Thus, your contact letters, providing misinformation as to the requirements for the final extension request permitted under Trademark Rule 2.102(c)(3), support the finding that the extension requests at issue here were filed for improper purposes, specifically "...to obtain additional time to harass applicant, to obtain unwarranted extensions of the opposition period, and to waste resources of applicant and the Board." *Id.* at 1216.

In view thereof, it is determined that you have not made a showing that you have a colorable claim of damage justifying the extension requests filed during the period in question and have failed to establish good cause for filing such requests. It is determined, further, that you filed the extension requests for improper purposes, namely, to harass the applicants to pay you to



avoid litigation or to license one of the marks in which you assert a baseless claim of rights. Your misuse of the TTAB's procedures dictates that the USPTO impose on you an appropriate sanction.

### **Sanctions Imposed**

In deciding what sanctions to impose, the USPTO considered the egregious nature and extent of your recent misconduct, including the impact of the misconduct on TTAB proceedings. You have been granted 90-day extensions of time to oppose more than 1800 applications. The effect has been to delay by at least three months the issuance of trademark registrations for each of those applications. In addition, the TTAB has had to divert significant resources to answering telephone inquiries from applicants or their representatives concerning your numerous filings. And the applicants against whom you have filed requests for extension of time to oppose have begun to submit formal objections that the TTAB must decide.

Also, the USPTO found it reasonable and proper to consider your recent misconduct in the context of your well-documented pattern of misconduct during many years of litigation before the TTAB and the courts as set out in the show cause order, which included the sampling of TTAB cases in which sanctions were imposed against you<sup>10</sup> and the case in the Northern District of Illinois.<sup>11</sup> Cf. C.

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<sup>10</sup> Indeed, irregularities with respect to your filing of requests to extend time to oppose have been considered previously. See, for example, *Stoller v. Northern Telepresence Corp.*, 152 Fed. Appx. 923, 2005 WL 2813750 (Fed. Cir. 2005), affirming the TTAB's decision denying as untimely your request(s). See also *Central Manufacturing, Inc. v. Third Millennium Technology, Inc.*, 61 USPQ2d 1210 (TTAB 2001), imposing a sanction, for a period of one year, which required the actual signature of the adverse party for any request to extend time to oppose filed by you in which it was alleged that such request was being sought on consent, or had been agreed to, or in which there was any allegation of any type of settlement discussion. This sanction was imposed because the TTAB found that the applicant had not "agreed" to the extension requests, that the parties were not engaged in bilateral settlement discussions, and that applicant had not invited opposer to proffer a settlement agreement, all determinations being contrary to your proffered reasons for seeking the extensions at issue therein. The TTAB further found that you "filed papers based on false statements and material misrepresentations and, moreover, ... engaged in a pattern of submitting such filings to this Board."



Wright & A. Miller, 5A Fed. Prac. & Pro. Civ.3d § 1336.1 (2006) (appropriate to consider prior behavior in other cases when exercising a court's inherent authority); Fed. R. Civ. P. 11, Advisory Committee's Note (1993) (same consideration appropriate under Rule 11). While the USPTO has considered findings made by other tribunals, the pattern of activities in the TTAB alone justify the sanctions imposed below.

The following sanctions are, therefore, hereby imposed:

**Grant of Extension Requests Vacated**

The approval of each request for extension of time to oppose that you have filed since November 2005 is hereby vacated.<sup>12</sup>

**Two-Year Prohibition On Filing Extension Requests**

You are hereby prohibited for a period of TWO YEARS from the date of this order from filing, on your own behalf or as an officer, director, or partner of any entity you control, any request for extension of time to oppose under Trademark Rule 2.102. This two-year prohibition applies whether or not you are represented by an attorney.

**Requirement Of Attorney Representation For Any Future Extension Requests**

You are PERMANENTLY prohibited from appearing before the USPTO on your own behalf or as an officer, director, or partner of any

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<sup>11</sup> In contrast to the two cited orders of the Northern District of Illinois in which the Executive Committee and the Court declined to impose sanctions, that court has chastised and sanctioned you numerous times. See, e.g., *S Industries, Inc. v. JL Audio, Inc.*, 29 F. Supp.2d 878 (N.D. Ill. 1998) ("This has not been a good year for Plaintiff in the Northern District of Illinois, but, then again, Plaintiff has not been a good litigant."), referencing several other cases before the Court that had been decided against you. See also *Central Mfg. Co. v. Pure Fishing, Inc.*, 2005 WL 3090998 (N.D. Ill. 2005) (and cases cited therein), in which the court imposed the sanction of dismissing plaintiff's claim and granting defendant's counterclaims to cancel registrations you own and for declaratory and injunctive relief. (The *Pure Fishing* case is suspended pending resolution of your petition in bankruptcy.)

<sup>12</sup> Extension requests granted more than 90 days ago have now expired. This sanction is, thus, moot with respect to such requests. But, if you have filed a notice of opposition against any of the involved marks, such notice of opposition is rendered untimely by this sanction, and any such opposition shall be dismissed.

entity you control for the purpose of filing any request to extend time to file a notice of opposition or any paper associated therewith. Any such future request must be filed by an attorney, who will be bound to act in accordance with USPTO Rule 10.18(b).

#### **Request For "Direction"**

Finally, you requested "direction" in how to proceed before the TTAB. As a frequent party to proceedings before the TTAB during the past ten years, you have been informed repeatedly about how the TTAB expects proceedings to be conducted. In the past, you have often ignored the direction given you by the TTAB, in the form of information or reprimand, or have found a way to side step such direction with improper or bad faith conduct.

The USPTO provides information to parties and the public electronically in a user-friendly format. The Trademark Act, the rules of practice in matters before the TTAB, The Trademark Trial and Appeal Board Manual of Procedure (2d ed. rev. 2004), and answers to frequently asked questions are all available for viewing and downloading at [www.uspto.gov](http://www.uspto.gov). While an individual may represent himself or herself (or a business in which he or she is an officer or partner) before the USPTO, see Patent and Trademark Rule 10.14(e), the TTAB "strongly recommend[s]" that a party be represented by an "attorney familiar with trademark law." TBMP §114.01 (2d ed. rev. 2004). Those who choose to represent themselves occasionally call the TTAB with questions and are provided procedural information. Overall, after being directed to the TBMP, they abide by the rules. Thus, there is no reason for the USPTO to conclude that the explanations provided in the TBMP are too complicated for *pro se* litigants, particularly for ones with an extensive history of practice before the TTAB.

Consequently, the TTAB's "direction" to you will remain the same that it has been for many years and the same as that given to other litigants representing themselves: engage an experienced trademark lawyer. Failing that, read and follow the applicable statute, rules, and cases and consult the TBMP for guidance.

#### **Potential for Imposition of Broader Sanctions**

The applicable rules permit broader sanctions. For instance, the USPTO considered whether to bar you permanently from filing

extension requests or to require that you be represented by an attorney with respect to any future Board matter, not just requests for extensions of time to oppose. At this time, the USPTO has restricted the sanctions imposed herein to those closely related to your recent misconduct and, it believes, the minimum necessary to prevent such misconduct in the future. Nonetheless, the question of broader sanctions will be revisited if you commit further improprieties in proceedings before the TTAB.

So ordered.

/signed/

J. David Sams  
Chief Administrative Trademark Judge  
Trademark Trial and Appeal Board  
United States Patent and Trademark Office

# **EXHIBIT O**

Google Opposition and Petition to Cancel.txt

From: L Lee [ldms4@hotmail.com]  
Sent: Friday, March 31, 2006 10:12 PM  
To: Michael T Zeller  
Subject: Google Opposition and Petition to Cancel

For Settlement purposes only not discoverable Rule 408 Cal. Evid.  
Code 1152

Michael Zeller:

I will sent to you this week a copy of our Notice of Opposition and Petition to Cancel Google's Registrations Nos. 2806075 and 2884502 if the Board has not served them on you along with our discovery. I also will notice up Google two founders for their depositions, let us hope that they do not make any misstatements of material facts under oath, because I have no problem with referring them to the US Attorney for a perjury charge should they lie under oath.

There are good business reasons why most knowledgeable business leaders do not want to submit to depositions, but Google's management cannot weight to testify in this case, because their model is "do no evil"!

Friday Google stock went down again. In fact Google's stock has gone down more in the last 60 days than most stock is worth.

Mr. Zeller after 34 years of trademark litigation I can still never understand why your ilk prefer to engage in full blown litigation rather than recommend to your client to settle, when you can settle for only pennies on the dollar.

I have another opponent that has recently spent over \$1,000,000 to try to defeat me when they could have guaranteed themselves a early victory for 10 cents on the dollar, that which they have spent. That controversy has no end in sight. Maybe you will be able to explain to me why Google will risk their registrations, their reputation in the public market place than having offered to settle this case prior to this point for a few cents on the dollar.

Settling litigation is merely a cost of doing business, nothing more nothing less. Google's refusal to deal in good faith to resolve this registerability issue is going to lead to the cancellation of Google's flagship trademark Registrations 2,806075 and 2,884,502 because I am the one entity in the country that is being damated, has the motivation, time, money and experience to put before the Trademark Trial and Appeal Board what everyone else knows, but does not have the expertise to do, that Google's marks have become generic.

When I see Google marks I think of the story of the Emperor Clothes. Everyone know that the Emperor was not wearing any clothes but no one would tell him. Every one knows that Google's trademarks are not worth the paper that they are written on, but no one is willing to plead a proper cancellation before the Trademark Trial and Appeal Board in order for Google's marks to be properly canceled, except I am fortunate to find myself in a position to be damaged by the continued existence of Google's mark on the principle register.

The Registrations No. 2,806075 and 2,884,502 do not belong on the principle register. The only reason why they exist at all is because no one has plead a proper petition to cancel before the Board.

What is not reported in the press about me is that 99% of my opponents opt to settle. Google is in the 1% category that refused to pay any deference to my early on trays for a quick settlement.

Even at this late stage Google's only concern is to see the cards that I am holding in my hand before they offer to settle. See if I am capable of pleading a bullet

Google Opposition and Petition to Cancel.txt  
proof and deadly pleading. Mr. Zeller you never stop testing your opponents do you. Well it is a matter of public record that Leo Stoller has successfully opposed more Applications and canceled more Registrations than any other entity in America. And I will cancel Google's marks, because we are being damaged by their existence and because Google refused to deal in good faith to resolve this controversy when they should have.

If you have nothing else to do this week end just go to the TTABblog and you can read all about me and how I make my living.

Have a pleasant week-end.

Most Cordially,

/Leo Stoller/  
Leo Stoller, President  
Central Mfg. Inc.  
7115 W. North Avenue #272  
Oak Park, Illinois 60302  
773-589-0340  
FAX 773-589-0915  
www.rentamark.com

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# **EXHIBIT P**

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RENTAMARK IS A FULL SERVICE TRADEMARK LICENSING, TRADEMARK LITIGATION SUPPORT SERVICES, TRADEMARK VALUATIONS, EXPERT WITNESS TESTIMONY WITH OVER 30 YEARS EXPERIENCE IN TRADEMARK MATTERS: LITIGATION IS WAR WELCOME TO THE FRONT

WEDNESDAY, APRIL 19, 2006

## CABELA'S SENT CEASE AND DESIST LETTERS



CABELA'S one of the largest sporting goods retailers and mail order company has been sent cease and desist letters by CENTRAL MFG, a company that hold rights to the

famous STEALTH trademark, for the unauthorized sale of STEALTH BRANDED GOODS.

CABELAS's has liability in the distributing process. Courts have extended the category of contributory infringer to include "all those who knowingly play a significant role in accomplishing the unlawful purpose. Courts have held that the contributory infringement doctrine is not limited merely to acts of designedly furnishing dealers

with a means for consummating fraud, but extends liability to acts with the defendant should have realized would create an opportunity for misuse of a trademark." See McCarthy On Trademarks Section 25:19.



CABELA'S has been put on notice of the allegation of participating in "contributory infringement" of CENTRAL'S famous STEALTH BRAND on numerous occasions and CABELA'S has refused to take

### ABOUT ME

LEO STOLLER  
CHICAGO, ILLINOIS

Over 30 years in the field of trademarks, licensing and enforcement, expert witness testimony, trademark valuation Expert www.rentamark.com

[VIEW MY COMPLETE PROFILE](#)

### LINKS

- [Google News](#)
- [Edit-Me](#)
- [Edit-Me](#)

### PREVIOUS POSTS

- [CABELA'S SENT CEASE AND DESIST LETTERS](#)
- [ROBERT ULRICH CEO OF TARGET REFUSES TO TESTIFY](#)
- [CENTRAL FILES TODAY TO CANCEL GOOGLES FEDERAL TRADEMARK REGISTRATION 2,806,076](#)
- [I ONLY LIKE BIG GAMES! LITIGATION IS WAR WELCOME TO THE FRONT](#)
- [WHO IS LEO STOLLER](#)



the necessary remedial action to contact CENTRAL MFG to cure the situation.

POSTED BY RENTAMARK.COM AT 10:02 AM 0 COMMENTS

## ROBERT ULRICH CEO OF TARGET REFUSES TO TESTIFY



**CENTRAL MFG. CO.** Filed depositions notices of **TARGET'S** executives **Robert Ulrich, Timothy R. Baer Esq, Terrence J. Scully** and **Greg W. Steinhafel**. In order to avoid a scene

reminiscent of the scene of the tobacco executives, **TARGET** has refused to produce the executives of **TARGET** to testify under oath on behalf of **TARGET** in an Opposition proceeding No. 91170274 before the **Trademark Trial and Appeal Board** of the United States Patent Office.

**CENTRAL MFG.** a small Delaware, Trademark Licensing Firm, filed an Opposition to the Registration of **TARGET's** bulls eye mark at the Patent and Trademark Office, claiming superior rights in a confusingly similar bulls eye mark. Due to **TARGET's** refusal to produce its executives to testify, **CENTRAL** is moving to *compel* **Robert Ulrich, Timothy R. Baer Esq., Terrence J. Scully and Greg W. Steinhafel** to testify before the **Trademark Trial and Appeal Board**.



POSTED BY RENTAMARK.COM AT 6:28 AM 2 COMMENTS

TUESDAY, APRIL 18, 2006

TRADEMARKS

ARCHIVES

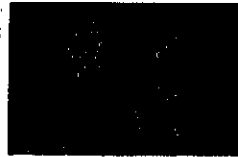
April 2006



CENTRAL FILES TODAY TO CANCEL  
GOOGLES FEDERAL TRADEMARK  
REGISTRATION 2,806,076



CENTRAL MFG  
CO., filed today a  
Petition to cancel



GOOGLE's flagship Federal Trademark Registration No. 2,806,075. Central has alleged numerous grounds for cancellation. Central alleges that the Trademark Trial and Appeal Board cancel GOOGLE's mark because it has become a "Generic" name for the goods or services for which it is registered 15 USC Section 1064(3). Central also alleges that GOOGLE has also perpetrated a fraud on the public by allowing its representatives to contact publishers of dictionaries in order to induce the publishers to change the "lexicon" of the 'google' meaning so as to avoid the Generic label. Central sites to a BBC NEWS report "Google calls in the 'language police'. "Google is now a *verb*, meaning to search. It sounds like the ultimate compliment to the company, so why do its lawyers want to keep the word out of our dictionaries?"

Google's problem is one of the paradoxes of having a runaway successful brand. The bigger it gets, the more it becomes part of "everyday" English language and less a brand in its own right." Central also alleges that Google has abandoned its mark based on naked licensing. Google according to the Central complaint has stated that the Google mark fails to function as a mark and/or is purely ornamental. Central alleges that the "said statement of use" was false.

#### GOOGLE'S CORPORATE CULTURE

Google is particularly known for its relaxed corporate culture, reminiscent of the Dot-com boom. google's corporate philosophy is based on many casual principles including, "*You can make money without doing evil!*"

POSTED BY RENTAMARK.COM AT 6:55 PM 1 COMMENT

SUNDAY, APRIL 16, 2006

### I ONLY LIKE BIG GAMES!



Sports fans will recall, what the great Glen (Bo) Schembechler (194 wins 48 losses) the University of Michigan football coach said in his last year (1969-1989) at U of M, when the sports reporter said, "Coach Schembechler you have only three games left to play, how do you feel about it?"

"I wish I had more games."

The reporter said, " who are the three teams?"

Schembechler replied, "Notre Dame, Stanford and Ohio State."

The reporter said, "those are all Big games".

Schembechler replied, "those are the only ones I like to play."

POSTED BY RENTAMARK.COM AT 2:08 PM 1 COMMENTS

### LITIGATION IS WAR WELCOME TO THE FRONT



# Google™



Rentamark is still battling Columbia Pictures over



**the mark**

**STEALTH.** You will recall that **SONY** the owners of **Columbia Pictures** released a Movie last July 29, 2005 named **STEALTH**. The battle in involves clearly merchandise that was sold under the **STEALTH MARK**.

**CENTRAL FILED APPEAL IN THE GEORGE BRETT CASE**

On Good Friday Central Mfg Co. Filed an Notice of Appeal in the George Brett trademark litigation, which involved Brett's use of the mark **STEALTH** on bats and Central Mfg Co., use of the mark on bats. Central had plead 35 **STEALTH** Federal Trademark Registrations, 10 of which were in International class 28. Brett plead no Federal Trademark Registrations.

Central Mfg Co., licenses Easton Sport to use its **STEALTH** mark on a line of base ball products including bats. In the Northern District of Illinois, Judge Coar issued a decision of "first impression" in that case. Judge Coar ruled that there was no likelihood of confusion as between Central and Brett's use of the *identical* mark **STEALTH** on the *identical* goods, **bats**, then went on to cancel Central's **STEALTH** mark on baseball bats based upon "likelihood of confusion. Never in the history of the USPQ has there ever been such a decision rendered where a District court judge issued a finding of no likelihood of confusion and then proceeds to cancel a trademark based upon "likelihood" of confusion. We are looking forward to hear what the 7th circuit thinks of that opinion!

You remember the press that we received as a result of the **Columbia Pictures** case regarding the Release of the **STEALTH** movie, it made all of the papers in North America. Of course that trademark litigation is still going. But that trademark story will be nothing compared to the trademark story that is now unfolding...

**STOLLER CANCELS THE GOOGLE TRADEMARK**

STOLLER'S opposition to Google's Application SN 76-314811 has been finally initiated on April 8th, 2006 Opposition Number 91170256.

STOLLER has move to Oppose based upon the legal theory that the **GOOGLE** mark has become generic. The Google mark is a "verb" Google has become nothing more than a generic term. Thus Google is not entitled to federal trademark registration of the Google trademark.

The company Google has been receiving a lot of press lately related to its stock price, its cooperation with the Chinese government etc.

STOLLER is also moving to consulate the said opposition with a cancellation proceeding involving Google's flagship trademarks Registrations 2806075 and 2884502 all of which have become generic and not entitled to federal trademark registration.

STOLLER believe that this will be the biggest trademark story for 2006.

because, not only has the dictionaries now define Google as a verb but Google's attorneys have unlawfully attempted to write to these dictionaries to get them to remove Google's name from the lexicon as a generic term. STOLLER has canceled more trademarks off of the principle register than any one else he knows of. STOLLER stated that aside from being "shot at and missed" there is nothing more satisfying to STOLLER than for him to cancel a Federal Trademark mark off of the principle register that should not be there.

STOLLER states that this is an important trademark lesson that demonstrates the principle that GOOGLE's mark became a victim of its own success. And if you don't believe STOLLER just "google it!"

### **CENTRAL OPPOSES TARGETS APPLICATION FOR BULL EYE MARK**

Central notified Target Stores of a potential Opposition regarding Targets newly filed Application for a bull eye mark. Target shot back and missed the bull eye, with a Petition to Cancel, Central's bulls eye mark, based upon likelihood of confusion and abandonment.

Central shot back and directed Target to Stealthues.com which evidence use of STEALTH's bull eye mark.. Where upon Target withdrew its Petition to cancel, but *not* before Central filed its answer.

Thus the withdrawal was *with prejudice*.

The Opposition is going forward and Targets Executives have been invited to give their depositions under oath.

Target by filing its Petition to cancel has clearly established by *judicial admission* that they could be damaged by Central's bull eye mark and that there is a likelihood of confusion as between the respective marks. Central will be able to establish priority of use. Target's Application for sporting goods is a "history lesson".

However, Target is barred by the doctrine of *Res Judica* from attaching Central's bull eye federal trademark registration for a similar bull's eye mark. Target will *never* be able to receive a Federal Trademark Registration in International Class 28 for toys and sporting goods products.

POSTED BY RENTAMARK.COM AT 12:50 PM 1 COMMENTS

## **WHO IS LEO STOLLER**

**WHY IS  
EVERYONE  
AFRAID OF LEO  
STOLLER AND**



**ATTEMPT TO  
VILIFY HIM IN THE PRESS**

*LEO STOLLER'S STORY*

LEO STOLLER was born in Chicago, Illinois. Went to high school in Chicago, went to the same High School as Coach K. Stoller received a football scholar ship to go to North Dakota. Stoller graduated from Mayville State University in North Dakota BS and received a MA from North Dakota State university in Fargo.

Stoller is a Republican. Leo Stoller started his business in Chicago, Illinois in 1974. He began as an importer of general merchandise. Stoller invented a new tennis racket and holds a US Patent for his invention.

Stoller is the Executive Director of Americans for the Enforcement of Intellectual Property Rights [www.rentamark.com/aeipr](http://www.rentamark.com/aeipr), Americans for the Enforcement of Attorney Ethics [www.rentamark.com/aeae](http://www.rentamark.com/aeae), American for the Enforcement of Judicial Ethics [www.rentamark.com/aeje](http://www.rentamark.com/aeje). Stoller is the Director of [www.rentamark.com](http://www.rentamark.com).

Stoller in the 70's and 80's created a large number of brands for his products and services including the now famous **SENTRA, DARK STAR, AIR FRAME, HAVOC AND STEALTH** BRANDS etc. His customers included all of the major retailers including **Wal-Mart, K-Mart, Sears** etc. In the eighties customers started coming to Stoller to obtain trademark licenses because the trademarks that Stoller had developed became famous. Stoller started licensing his famous trademarks on a broad range of products and services. In order to protect these trademarks it required a substantial amount of litigation. Because once a trademark become famous, there is a strong incentive for trademark squatters to attempt to obtain use of a famous mark without having to pay for it. In fact, Stoller would argue that trademark squatting is a very profitable business, because famous trademarks are very expensive to police and to protect. All a trademark squatter has to do is to affix a famous mark to its goods and services and that company can benefit from the "good will" obtained by the original owner and immediately gain access to markets that would not otherwise be available. Secondly, the

trademark squatter does not have to pay any royalty rates so it is very profitable to "trademark squat" with a strong likelihood of "getting away" with the trademark squatting before being caught.

### **NO ONE LIKES THE LANDLORD**

Protecting Trademarks is import part of the trademark licensing business. Otherwise no will license a mark if the owner is not willing to protect it. Stoller's guiding principle for trademark protection is derived from the Bible of trademark law **McCarthy on Trademarks** Section 11:91 **ASSERTIVE ENFORCEMENT OF MARKS.**

"Trademarks are weak when they are merely one of a similar crowd of marks. How does this happen? The only way a trademark owner can prevent the market from becoming crowded with similar marks is to undertake an assertive program of policing adjacent "territory" and suing those who edge too close. Judge Neather observed that:

Strength is primarily a question of degree, an amorphous concept with little shape or substance when divorced from the marks commercial context, including an appraisal of the owner's policing efforts to ensure that whatever distinctiveness or exclusivity has been achieved is not lost through neglect, inattention or consent to infringing use.

It has been observed that an active program of prosecution of infringer, resulting in elimination of others' uses of similar marks, enhances the distinctiveness and strength of a mark, since no one else uses a similar sounder name, plaintiff's name looks an sounds all the more unique. The Fifth Circuit said that the lack of vigilant enforcement of the mark **DOMINO** for sugar resulted in a narrowing of protection to only the sugar filed...Even when the plaintiff fights hard and loses its trademark suit this does not mean that there was bad faith enforcement. When Procter & Gamble lost a trademark suit, Judge level noted that:

Procter & Gamble cannot be faulted for zealously protecting its trademark interest. Indeed, the trademark law not only encourages but requires one to be vigilant on pain of losing exclusive rights...P&G was entitled to use all the ammunition it had".

As everyone knows in the Trademark community Leo Stoller engages in the Assertive Enforcement of its marks. Stoller does this pursuant to the rules and guide lines out lined in McCarthy on Trademarks.

Stoller has thus far prevailed in over 90% of its police actions against third party infringers. Companies like Wal-Mart, K-Mart and hundreds of other well known American companies have acknowledged Stoller's superior rights to its marks as a result of trademark litigation.

In the nineties, with the advent of the internet, this has allowed anyone with any grievance founded or unfounded a forum to publish their thoughts. This has lead to a fire storm of protest against litigants trademark holders such as Rentamark. Since the internet has allowed for the first time average consumers access to intellectual property. Prior to about 1995, the average consumer had no need to hold rights to trademarks, domain names etc. This was the dominion of corporations.

Now that consumer have attempted to join the intellectual property they are confronted with being subject to violating trademark infringement laws. Which they do all of the time. The press has vilified Leo Stoller merely because he engages in the Assertive Enforcement of its trademark rights.

POSTED BY RENTAMARK.COM AT 8:39 AM 0 COMMENTS

SATURDAY, APRIL 15, 2006

## TRADEMARKS

**Trademarks** in the 21st Century have become more difficult to acquire and once acquired more difficult to police and protect. The unauthorized use of trademarks is pendentic. The government requires that the Trademark holder protect his own mark. Trademarks are source identifiers.





Because well known marks, like STEALTH, WINDOWS and others can be so easily infringed it requires the trademark holder to have a staff devoted to the full time enforcement of the firms trademark rights and/or face the loss of those rights to third party infringers.

In the English language dictionary there a about 250,000 words that are trademarkable. There are over 3,000,000 registered Federal Trademarks on the Principle Register. In the US today there are over 20 million business competing for about 250,000 words all of which have long since been trademarked. For that reason companies are going to trademark licensing firms to license well known trademarks, like rentamark.com in order to avoid trademark controversies.

POSTED BY RENTAMARK.COM AT 9:43 PM 0 COMMENTS

# **EXHIBIT Q**



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RENTAMARK IS A FULL SERVICE TRADEMARK LICENSING FIRM OFFERING TRADEMARK LITIGATION SUPPORT SERVICES, TRADEMARK VALUATIONS, AND EXPERT WITNESS TESTIMONY WITH OVER 30 YEARS EXPERIENCE IN TRADEMARK MATTERS: LITIGATION IS WAR \* WELCOME TO THE FRONT

TUESDAY, JUNE 20, 2006

## GOOGLE CANNOT BUY OFF LEO STOLLER



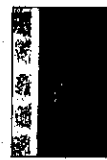
**CHICAGO--GOOGLE CANNOT BUY OFF LEO STOLLER.** Central Mfg Co., a Delaware Corporation that **Stoller** is the president petition to cancel GOOGLE INC Federal Trademark Registration on the

grounds that it has become '**generic**' and/or '**descriptive**' of the services covered under its Federal Trademark Registration. The overwhelming evidence of the mark **GOOGLE** becoming 'generic' and/or 'descriptive' also consists of the fact that the word 'google' can be found in the dictionary describing the services covered under **GOOGLE'S** Federal Trademark Registration <http://dictionary.reference.com/browse/google/>

**GOOGLES INC's** Federal trademark Registration is **doomed** and will become a *trivia* question on game shows. "For 100 dollars what former famous trademark has become '*generic*' and lost its Federal Trademark Registration?" "What is Google?" "Your right!"

**GOOGLE INC'S** founders **Larry** and **Sergey** are the **26th** and

### ABOUT ME



**LEO STOLLER**  
**CHICAGO, ILLINOIS**

**LICENSOR** of numerous famous trademarks including **STEALTH,**

**SENTRA, DARK STAR, AIR FRAME, STRADIVARIUS, HAVOC, TRIANA, TRAVELING NURSE, WHITE LINE FEVER, CHESTNUT, TRIADE** etc.. see [www.rentamark.com](http://www.rentamark.com). Leo Stoller graduated from Mayville State College with a BS Degree and North Dakota State University, **MASTERS DEGREE.** Leo Stoller is the nation's most renowned Intellectual Property Entrepreneur with over 30 years in the field of trademarks, licensing and enforcement, expert witness testimony, trademark valuation Expert and legal ethics expert. Leo Stoller has appeared on FOX NEWS, CBS and in numerous national news papers including the New York Times and on many radio talk shows Leo Stoller is ready to go to work for you: contact information: Leo Stoller, President/CEO Central Mfg Co., Stealth Industries, Inc., Rentamark.com, 7115 W. North Avenue #272, Oak Park, Illinois 60302. Phone 773-283-3880, Fax

**27th** richest people in American worth about **14 billion dollars each**. **Stoller** will **not** accept any monetary settlement to resolve this trademark controversy. In other words **GOOGLE** does **not** have enough money to save their Federal Trademark Registration from being canceled on the grounds that it has become '**generic**' and/or '**descriptive**'.

The lesson here is that we are all equal under the law and that **no** amount of money can save a Federal Trademark Registration from being canceled if the law requires, as is the case at bar even if the owners are worth billions.

POSTED BY RENTAMARK.COM AT 12:06 AM

## AEJE HONORS TTAB JUDGE PAULA T. HAIRSTON



**CHICAGO--AMERICANS FOR THE ENFORCEMENT OF JUDICIAL ETHICS**, a group located in Chicago that has advocated the strick enforcement of judicial ethics [www.rentamark.com/aeje/](http://www.rentamark.com/aeje/) today honors Trademark Trial and Appeal Court Judge (TTAB)

### PAULA T. HAIRSTON.

**Judge Hairston** was a Interloctory Attorney, Assistant to the Assistant Commissioner for Trademarks. She was a was involved with Petitions and special projects for the Commissioner. **Judge Hairston** received her B.A. Degree with honors from the University of North Carolina at Greensboro. **Judge Hairston** received her J.D. Degree from Catholic University of America with the highest distinction. Judge Hairston has developed a reputation for making fair and impartial decisions. She remains a good student of law and renders well reasons opinions. AEJE honors **Judge Paula T. Hairston** today.

POSTED BY RENTAMARK.COM AT 12:01 AM 2 COMMENTS

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### PREVIOUS POSTS

- [GOOGLE CANNOT BUY OFF LEO STOLLER](#)
- [AEJE HONORS TTAB JUDGE PAULA T. HAIRSTON](#)
- [QUINN EMANUEL ALLEGED TO VIOLATE TTAB ORDER](#)
- [CINDY B. GREENBAUM ISSUED ORDER SUSPENDING GOOGLE OPPOSITION AND PETITION TO CANCEL PROCEEDINGS](#)
- [LEO STOLLER WINS ANOTHER TTAB OPPOSITION PROCEEDING](#)
- [MICHAEL MONDAY AND ISABEL MONDAY BRAND WINES](#)
- [TERMS OF USE](#)
- [QUINN EMANUEL- MICHAEL T. ZELLER ABOVE THE LAW](#)
- [AEJE OFFERS KUDOS TO TTAB JUDGE DAVID E. BUCHER](#)
- [MICHAEL T. ZELLER PANICS](#)

## QUINN EMANUEL ALLEGED TO VIOLATE TTAB ORDER



ARCHIVES

April 2006

May 2006

June 2006

WASHINGTON--THE LAW FIRM OF QUINN EMANUEL URQUHART OLIVER & HEDGES that raked in over 193 million dollars last year is charged with violating a Trademark Trial and Appeal Court Board Order dated June 15, 2006 issued by Ms. **Cindy B. Greenbaum**. QUINN EMANUEL represents **Google Inc.**, in a petition to cancel proceeding. **Central Mfg. Co.**, a Delaware Corporation located in Chicago filed a Petition to Cancel **Google Inc.**'s **GOOGLE** Federal Trademark Registration No. **2806075** on the grounds that it is "**generic**" and/or "**descriptive**" of the services covered under **Google's** Federal Trademark Registration. The irrefutable evidence that the mark **GOOGLE** is generic and/or descriptive comes from the fact that the word "**google**" is now and has been in the dictionary



<http://dictionary.reference.com/browse/google/>

**Central Mfg Co.**, filed a timely motion for summary judgment on **May 15, 2006**. There are no triable issues of fact. The mark 'google' is '**generic**' and/or '**descriptive**' case closed. However the famous law firm of **QUINN EMANUEL** does **not** want to submit to the authority of the Board (**TTAB**) and is now charged with violating a **TTAB** Order dated **June 15, 2006**.

Ms. **Cindy B. Greenbaum** **TTAB** attorney issued an order suspending the Petition to Cancel proceeding pending the disposition of out standing motions. Notwithstanding the said Board order dated **June 15, 2006** suspending the proceeding, **QUINN EMANUEL** files *another* motion "to suspend Pending Disposition of Civil Action." **QUINN EMANUEL** have absolutely *no* defense to Central's motion for summary judgment. Thus **QUINN EMANUEL** choose to engage in classic dilatory tactics and filed an additional motion despite the Order of Ms. **Greenbaum**. **In order to avoid having to respond to a motion for summary judgment in which there is "no" valid response likely.**

POSTED BY RENTAMARK.COM AT 12:00 AM

MONDAY, JUNE 19, 2006

## CINDY B. GREENBAUM ISSUED ORDER SUSPENDING GOOGLE OPPOSITION AND PETITION TO CANCEL PROCEEDINGS



**WASHINGTON--CINDY B.  
GREENBAUM  
TRADEMARK TRIAL AND  
APPEAL ATTORNEY  
ISSUED AN ORDER ON**

June 15, 2006 suspending the **GOOGLE** Opposition and Petition to Cancel Proceeding "pending the disposition of the pending motions. Any paper filed during this pendency of these motions which is not relevant thereto will be give no consideration. See trademark Rule 2.127(d). Central Mfg. Co., (Inc) a Delaware corporation filed an Notice of Opposition and a Petition to Cancel **GOOGLE INC'**s Federal Trademark Registration on the "grounds" that the mark **GOOGLE** has become "**generic**" and/or "**descriptive**" of the services covered under **GOOGLE INC'S** Federal Trademark Registration. There is **no** question that the mark **GOOGLE** is **generic** and/or **descriptive because it is now in the dictionary**

<http://dictionary.reference.com/browse/google/> and the definition **defines the services covered under the GOOGLE mark.**

The Board suspended the said proceedings to deal with pending motion to compel and a motion for summary judgment.

If you have an opinion as to the mark Google becoming **generic** and/or **descriptive** please call **Leo Stoller**, the representative of Central Mfg Co., 773-589-0340 or email [ldms4@hotmail.com/](mailto:ldms4@hotmail.com) Leo Stoller is a trademark expert who can provide, expert witness testimony, trademark valuations, trademark licensing

www.rentamark.com/ trademark litigation support services.

POSTED BY RENTAMARK.COM AT 12:08 AM

## LEO STOLLER WINS ANOTHER TTAB OPPOSITION PROCEEDING



### CHICAGO--LEO STOLLER WINS ANOTHER OPPOSITION RECEIVING JUDGMENT IN HIS FAVOR

**DENYING REGISTRATION OF THE MARK STEALTH DUMP TRUCKS.** STEALTH DUMP TRUCKS, INC. filed a trademark application for the mark **STEALTH DUMP TRUCKS** for use on Dump Truck conversion kits consisting of scissor-type powered operated bed lift that converts a stationary pickup truck bed into a Dump Truck. **Leo Stoller** filed a notice of opposition based upon holding prior rights to the famous mark **STEALTH**. Neither Stoller nor any of his companies hold a **STEALTH** mark for Dump Trucks per se. "Trademarks are weak when they are merely one of a similar crowd of marks. The only way a trademark owner can prevent the market from becoming crowded with similar marks is to undertake an assertive program of policing adjacent territory and suing those who edge too close." See McCarthy on Trademarks Section 11:91

### ASSERTIVE ENFORCEMENT OF MARKS.

"It has been observed that an active program of prosecution of infringers, resulting in elimination of others' uses of similar marks, enhances the distinctiveness and strength of a mark since no one else uses a similar sounding name, plaintiff's name looks and sounds all the more unique." *id* The Board granted judgment "against applicant, the opposition is sustained, registration to applicant is refused". The TTAB decision against **Stealth Dump Truck Inc.**, and in favor of **Central Mfg. Co.**, was entered on **June 15, 2006**. **Leo Stoller** has participated in over 200 inter party proceedings over **25** years prevailing in over **95%** of the time and over 60 district court trademark cases involving his famous **STEALTH MARK**. For trademark licensing opportunities for the famous mark AIRFRAME and other famous trademarks please contact **Leo Stoller** 773-589-

0340 email ldms4@hotmail.com/ 773-589-0340 fax see  
www.rentamark.com/ To obtain a trademark valuation, expert  
witness testimony, litigation support services, legal research, brief  
writing, appeals you have found your source, contact **Leo Stoller**  
today. Buy, sell, trade and/or license trademarks call **Leo** 773-589-  
0340

POSTED BY RENTAMARK.COM AT 12:00 AM 0 COMMENTS

SATURDAY, JUNE 17, 2006

### MICHAEL MONDAY AND ISABEL MONDAY BRAND WINES



ILLINOIS--**MICHAEL  
MONDAY** and/or **ISABEL  
MONDAY** NON-alcoholic  
WINES TASTE LIKE THE  
REAL THING. The **MICHAEL**



**MONDAY & ISABEL. MONDAY** BRAND for

wine(s) and for beverage products are available for trademark  
licensing opportunities. The use of the **MICHAEL MONDAY**  
and/or **ISABEL MONDAY** BRAND on your line of cheeses,  
crackers, beverages, vinegar products will assist your company in  
immediately obtaining market share. Please contact rentamark at  
773-589-0340. Email ldms4@hotmail.com www.rentamark.com

POSTED BY RENTAMARK.COM AT 10:04 AM

### TERMS OF USE

Terms of Use



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BASIS. Rentamark MAKES NO REPRESENTATIONS OR



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POSTED BY RENTAMARK.COM AT 12:51 AM 0 COMMENTS

## QUINN EMANUEL- MICHAEL T. ZELLER ABOVE THE LAW



### CHICAGO--MICHAEL T. ZELLER THE 1.6 MILLION



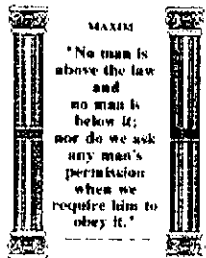
#### DOLLAR LAWYER FROM THE FAMOUS

LAW FIRM OF QUIN EMANUEL, who racked in last year over 93 million dollars, claims to be above the law. The rentamark blog has "terms of use" like most every other web site on the net. MICHAEL T. ZELLER has written a letter to Leo Stoller dated June 16, 2006 stating, "*Your alleged 'terms of Use' are rejected*". Part of rentamark's terms of use is that no material can

be reproduced without permission of rentmark.

QUINN EMANUEL position, "It seems inconceivable that any court would hold such reproduction to constitute infringement either by the government or by the individual parties responsible for offering the work..Obviously, your unilateral attempt to impose the supposed "terms of Use" on counsel representing an adverse party is only the latest episode in your long-standing campaign to conceal evidence of your wrongdoing from the Board and the Courts...It is no coincidence that your supposed "terms of use" come on the heels of Google's brief documenting the frivolousness of your previous attempts to thwart Board scrutiny of your misdeeds by invoking Federal Rule of Evidence 408 and the California Evidence Code. Apparently, having recognized that those rules will not shield your wrongdoing, you now seek to misuse copyright law to do so. This latest endeavor on your part to obstruct the truth is equally misplaced..."

It is obvious that if QUINN EMANUEL MICHAEL T. ZELLER dislike a web site owners "terms of use" they will breach them. As is the case at bar. There knowingly and willfull breach will not shield them from a copyright infringement lawsuit as well known to them. Who will ultimately prevail would of course be left to the courts.



The question is, Is QUINN EMANUEL MICHAEL T. ZELLER ABOVE THE LAW?

POSTED BY RENTAMARK.COM AT 12:00 AM 0 COMMENTS

FRIDAY, JUNE 16, 2006

AEJE OFFERS KUDOS TO TTAB JUDGE DAVID E. BUCHER



CHICAGO--THE AMERICANS FOR THE

**ENFORCEMENT OF JUDICIAL ETHICS, A CHICAGO BASED GROUP,**

www.rentamark.com/acje/ that for over 25 years advocates the strick enforcement of judicial ethics honors Trademark Trial and Appeal Court (TTAB) Judge **David E. Bucher**. Judge **Bucher** was appointed to the TTAB in 1998. Judge **Bucher** is well qualified for the issues raised before the TTAB for he was a Trademark Examining Attorney from 1981 until 1984. Judge **Bucher** became a senior examining Attorney from 1984 until 1985. Judge **Bucher** was a legislative Assistant to U.S. Senator **Paul Simon** who was from the great state of Illinois. He was the Director of the Trademark Examining Organization from 1987 until 1998. When he became Deputy Assistant Commissioner for Trademarks from 1996-98. He received his under graduate degree from Eastern Mennonite University in 1974 and his J.D. Degree from George Washington University in 1979 with honors. Considered by many, Judge **David E. Bucher** is one of the most qualified TTAB judges on the bench.

POSTED BY RENTAMARK.COM AT 12:11 AM 0 COMMENTS

**MICHAEL T. ZELLER PANICS**



**LOST**



**ANGELES--MICHAEL T. ZELLER** Esq., an attorney

with the firm of **Quinn Emanuel Urquhart Oliver & hedges**, who made over 1.6 million dollars in 2005 is currently in a state of panic as he represents **GOOGLE INC.**, in a Petition to Cancel Proceeding, where **GOOGLE's** Federal Trademark is on the verge of being canceled because it is in the dictionary, <http://dictionary.reference.com/browse/google/> it describes the services that **GOOGLE INC.**, Registration covers making google's Registration "generic" and/or descriptive. Google's Federal Trademark Registration is no longer entitled to federal trademark registration.

**Central Mfg Co., (Inc)** a Delaware Corporation located in Chicago filed the petition to cancel and filed a motion for summary judgment to dispose of the case because there are no triable issues of fact. Google is "generic" and/or descriptive. Case Closed. Now that the famous **Michael T. Zeller** is facing a Motion for Summary Judgment, he is refusing to respond to the said motion and is attempt to file some frivolous motions in order to avoid the inevitable cancellation of the said **Google** Trademark Registration. **Zeller** send a letter to Central Mfg Co., notifying them that "*Google intends to file a combined motion to suspend Cancellation No. 92045778...*" Zeller was seeking the consent of Central, which was denied.

If you have an opinion as to the **Google** trademark becoming "generic" for internet search engines please call Leo Stoller 773-589-0340 email [ldms4@hotmail.com/](mailto:ldms4@hotmail.com) [www.rentamark.com/](http://www.rentamark.com/)

POSTED BY RENTAMARK.COM AT 12:08 AM 0 COMMENTS

## AEAЕ RECONGNIZES PATRICK R. PETTITT



**CHICAGO-- AMERICANS FOR THE ENFORCEMENT OF ATTORNEY ETHICS**, a Chicago based group [www.rentamark.com/aeae/](http://www.rentamark.com/aeae/) that has for over **25** years advocated the strick enforcement of attorney ethics recongizes **Patrick R. Pettitt** Esq. An



attorney that is trust worthy. **Patrick Pettitt** is a partner in the **Patten, Wornom, Hatten & Diamonstein** [www.pwhd.com/](http://www.pwhd.com/) Business and Real Estate Group. Mr. **Pettitt** focuses his practice on advising and guiding for-profit businesses and non-profit organizations on a broad range of day-to-day operational issues that face any growing business or organization. His clients range in size from new business start-ups to regional and national clients. He leads clients through complex business transactions, from business formation to mergers and acquisitions, business spin offs and

reincorporations, contract preparation and negotiation, landlord-tenant law, criminal and traffic matters, as well as general civil litigation in Virginia's State Courts and sophisticated commercial real estate transactions, ranging from single asset acquisitions and sales to elaborate, multi-jurisdictional transactions using a broad variety of credit facilities.

Mr. **Pettitt** received his Juris Doctorate degree from William & Mary law school in Williamsburg, Virginia, where he was a student-member of the Moot Court board and chaired the William B. **Spong**, Jr. Invitational Moot Court Tournament. Mr. **Pettitt** was also selected for the National Trial Team competition and was inducted into the Order of the Barristers. His email address is [ppetitt@pwhd.com](mailto:ppetitt@pwhd.com)

POSTED BY RENTAMARK.COM AT 12:04 AM 0 COMMENTS

## LEO STOLLER WINS ANOTHER AIR FRAME OPPOSITION



**CHICAGO--LEO STOLLER WINS ANOTHER OPPOSITION RECEIVING JUDGMENT IN HIS FAVOR DENYING REGISTRATION OF THE MARK AIRFRAME. Kenneth R. Ebert**



President of Segway Concepts, filed a trademark application for the mark **AIRFRAME** for use on surfboards, skateboards, wakeboards, windsurfers, snowboards, skimmerboards. **Leo Stoller** filed a notice of opposition.

"Trademarks are weak when they are merely one of a similar crowd of marks. The only way a trademark owner can prevent the market from becoming crowded with similar marks is to undertake an assertive program of policing adjacent territory and suing those who edge too close." See McCarthy on Trademarks Section 11:91 **ASSERTIVE ENFORCEMENT OF MARKS.**

"It has been observed that an active program of prosecution of infringers, resulting in elimination of others' uses of similar marks, enhances the distinctiveness and strength of a mark since no one else uses a similar sounding name, plaintiff's name looks and sounds all the more unique." id The Board granted judgment *"against applicant, the opposition is sustained, registration to applicant is refused"*. The decision was entered on **May 30, 2006**.

**Leo Stoller** has participated in over **200** inter party proceedings over **25** years prevailing in over **95%** of the time and over **60** district court trademark cases. For trademark licensing opportunities for the famous mark **AIRFRAME** and other famous trademarks please contact **Leo Stoller** 773-589-0340 email [ldms4@hotmail.com](mailto:ldms4@hotmail.com)/ 773-589-0340 fax see [www.rentamark.com/](http://www.rentamark.com/) To obtain a trademark valuation, expert witness testimony, litigation support services, legal research, brief writing, appeals you have found your source, contact **Leo Stoller** today. Buy, sell trade

POSTED BY RENTAMARK.COM AT 12:01 AM 0 COMMENTS

## SENTRA INDUSTRIES FILES OPPOSITION TO MICHAEL MONDAVI TRADEMARK APPLICATION



### CHICAGO--SENTRA INDUSTRIES, INC., FILED AN NOTICE OF OPPOSITION TO THE TRADEMARK APPLICATION

**FOR THE MARK MICHAEL MONDAVI.** Former Mondavi CEO **Michael Mondavi** has just launched his own luxury wine business, with the aim of eventually setting us a new winery. The Frescobaldi family of Tuscany, which has long personal and business ties with the **Mondavi** family (Section 2(e)(4)), has just named Folio as their exclusive agent and importer in the US.

Folio Wine Company was founded several months ago by **Michael, eldest son of Robert Mondavi** and co-founder of Napa's most celebrated winery, Robert Mondavi Corporation, which has been bought in its entirety by Constellation brands.

Michael's wife **Isabella** and their children **Rob Jr** and **Dina** are also

involved. The company will be involved in importing, distributing and marketing quality wines and eventually creating its own winery. In an exclusive interview yesterday **Rob Mondavi** told decanter.com that being part of a large corporation the **Robert Mondavi Corporation** was exciting and offered opportunities, but they 'wanted to get back to their fine wine roots.'

'We are also looking forward to a more hands-on approach, getting back into the winery and being directly involved in all the different aspects of the business.'

According to Rob, Folio will either acquire or build its own winery in the near future. 'While things are happening quickly since we started up the company several months ago, we want to move cautiously.

**Sentra Industries, Inc.**, has filed is Notice of Opposition to the mark **MICHAEL MONDAVI** based upon it rights held in the mark **MICHAEL MONDAY** for the same and/or related goods. **Michael Mondavi** attorney said that they would provide vigorous defense. Stay tuned this promises to be a rather interesting Opposition controversy...

For trademark licensing opportunities for the famous mark **MICHAEL MONDAY** please call 773-589-0340 email [ldms4@hotmail.com](mailto:ldms4@hotmail.com)/ see [www.rentamark.com/](http://www.rentamark.com/) for a list of other famous trademarks available for license. Contact **Leo Stoller**, President for trademark valuations, trademark licensing, trademark expert witness testimony and litigation support services, legal research, brief writing, appeals etc.

POSTED BY RENTAMARK.COM AT 12:00 AM 0 COMMENTS

THURSDAY, JUNE 15, 2006

## IPL CONFERENCE TO BE HELD IN BOSTON JUNE 21



**BOSTON--THE 2006 SUMMER  
IPL CONFERENCE WILL BE**



**HELD IN BOSTON THIS YEAR ON**

JUNE 21. Boston is the home town of the blogger's blogger **John L. Welch** and he will be signing autographs at the "get acquainted" reception on Wednesday, June 21st from 6:00 to 7:00P.M. at the Marriott Copley Plaza. Four other well known IP Bloggers **Matt Buchanan, Dennis Crouch, ross Dannenberg and Lee Gesmer** will also be signing autographs. All of the bloggers have a proclivity toward spiritus products which will be available. The following pictures of the alleged bloggers was supplied by the **U.S. Postal Service** for which credit should be paid. If you can identify any of them from the picture you will be entitled to a free spiritus product of your choice. Where is **Marty**?

POSTED BY RENTAMARK.COM AT 12:39 AM 0 COMMENTS

**WING SUPPLY REMOVES OFFENDING  
STEALTH MERCHANDISE****GREENVILLE, KY--WING  
SUPPLY REMOVES THE  
OFFENDING STEALTH**

**MERCHANDISE.** "Per your letter dated June 5, 2006 (Central Mfg Co.,) we have taken the following steps.

The offending item has been removed from our site [www.wingsupply.com/](http://www.wingsupply.com/) and all advertising material with the **STEALTH** name has been removed. This advertising is boxed and ready to be destroyed or sent to you, as you desire. Please find enclosed a sales report indicating the date we entered the item into the system and the sales since that date...I *apologize* for this.

Hopefully you (Central Mfg Co.,) will allow us this error and trust that we have gotten our act together."

Signed **Lee Fauntleroy** President, **Fauntleroy Supply DBA Wing Supply.**

Please advise us if you see anyone selling any goods baring the mark **STEALTH**. You can call **Leo Stoller** at 773-589-0340 Email [ldms4@hotmail.com](mailto:ldms4@hotmail.com). For **STEALTH** trademark licensing opportunities you can contact **Leo Stoller** [www.rentamark.com/](http://www.rentamark.com/)

POSTED BY RENTAMARK.COM AT 12:00 AM 0 COMMENTS

WEDNESDAY, JUNE 14, 2006

### COMMON INTEREST

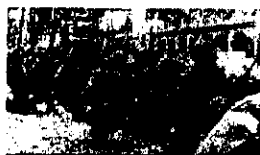


CHICAGO--WHAT DOES QUINN EMANUEL URQUHART OLIVER, KNOBBE MARTENS OLSON & BEAR, NIXON & VANDERHYDE, COOLEY GODWARD, KENYON AND KENYON, US. PATENT AND TRADEMARK OFFICE, HASBRO, INC., FOLEY HOAG & ELIOT, WILLIAMS MULLEN, FINNEGAN HENDERSON, FARABOW GARRETT, BUTZEL LONG, ARNOLD &

PORTER, JUDGE DAVID SAMS et al., have in common?

POSTED BY RENTAMARK.COM AT 8:39 AM 1 COMMENTS

### SUE THE BASTARDS!



CHICAGO--  
LEO  
STOLLER



RENTMARK ADVANCES ITS SUMMER OFFENSIVE WITH MORE LITIGATION. It a

appears that infringers and companies who refuse to agree to move off of a **rentamark brand trademark** [www.rentamark.com/](http://www.rentamark.com/) only under understand when the process server hands them a complaint.

*"It has been observed that an active program of prosecution of infringers, resulting in elimination of others' uses of similar marks, enhances the distinctiveness and strength of a mark since no one else uses a similar sounding name, plaintiff's name (STEALTH) looks and sounds all the more unique".* Section 11:91 McCarthy on Trademarks.



**Rentamark** is going after more infringers, if anyone knows of any party using the mark **STEALTH, DARK STAR, SENTRA, AIR FRAME et al.**, or any other **rentamark** brand mark see [www.rentamark.com](http://www.rentamark.com) Please call 773-589-0340 email [ldms4@hotmail.com/](mailto:ldms4@hotmail.com)

For **trademark valuations**, trademark searches, trademark licensing, buying, selling and/or renting a famous mark, **rentamark.com** is your one stop trademark center on the net. Look forward to hearing from you--reasonable rates.

POSTED BY RENTAMARK.COM AT 12:06 AM 0 COMMENTS

## LEO STOLLER RENTAMARK PROVIDES TRADEMARK SERVICES



**CHICAGO--LEO STOLLER RENTAMARK PROVIDE**



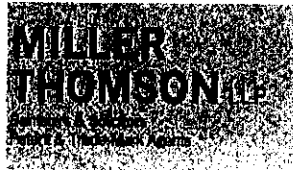
**TRADEMARK** services. For over **30** years experience in trademarks, trademark valuations, trademark damages, trademark licensing and trademark litigation. **RENTAMARK** provides a full service trademark litigation support services, trademark legal research, trademark policing. In order to protect your most valuable asset your trademark, Rentamark provides the most comprehensive trademark surveillance program on the net. Rentamark is experienced in locating infringers see [www.rentamark.com/](http://www.rentamark.com/) that may be ready to ambush you. Please call Leo 773-589-0340 for all of your trademark needs including expert trademark witness testimony, trademark valuations, trademark searches Call today, see are reasonable rates.  
email [ldms4@hotmail.com](mailto:ldms4@hotmail.com)

POSTED BY RENTAMARK.COM AT 12:05 AM 0 COMMENTS

## AEAЕ RECOGNIZES EUGENE J.A. GIERCZAK ESQ.



AMERICANS FOR  
THE  
ENFORCEMENT OF  
ATTORNEY ETHICS



(AEAЕ) RECOGNIZES Eugene J. A. Gierczak.

## Eugene J. A. Gierczak, P. Eng.,

### Publications by Eugene J. A. Gierczak, P. Eng.

Eugene Gierczak's practice involves providing advice on all aspects on intellectual property law including litigation.

He is a registered Professional Engineer for the province of Ontario, and a registered Patent and Trade Mark Agent in both the Canadian and U.S. Patent and Trade Mark offices.

Eugene has a long established history of filing and

prosecuting complex trade mark and patent applications covering electrical, electronic and mechanical, chemical devices and methods in Canada, the United States, Europe, Japan and major countries around the world.

POSTED BY RENTAMARK.COM AT 12:00 AM 0 COMMENTS

TUESDAY, JUNE 13, 2006

### MICHAEL ZELLER DENIES VIOLATING Fed. R. Evid 408



**MICHAEL ZELLER DENIES VIOLATING** Federal Rules of Evidence 408. In an Opposition proceeding No. 91170256 regarding Google's trademark Application SN 76-314,811, where **Michael Zeller** included documents

that were clearly mark "Confidential Fed. Rul. Evidence 408". **Zeller**, the brilliant trademark mind, claims that notwithstanding the Rule 408 disclaimer, the documents are **not** confidential and should not be stricken from his pleadings. Zeller represents Google.

POSTED BY RENTAMARK.COM AT 12:00 AM 0 COMMENTS

2,305

# **EXHIBIT R**

**Michael T Zeller**

---

**From:** L Lee [ldms4@hotmail.com]  
**Sent:** Thursday, February 09, 2006 2:14 PM  
**To:** Michael T Zeller  
**Subject:** Google's is mark is a verb, its Generic!

For Settlement purposes only not discoverable Rule 408 Cal. Evid.  
Code 1152

Michael Zeller:

Your client's silence is deafening. Feb. 3rd has come and gone and your client has not responded to our latest Settlement demand!

The Board gives us precious few days to attempt to resolve trademark issues prior to filing an Opposition. We are continuing to attempt to make a good faith effort to resolve this registerability issue outside of the TTAB and before the national press get a hold of this story.

The train has left the station and although your client is standing on the tracks and cannot see or hear the freight train, be assured its coming and it appears that your firm is encouraging this trademark registration collision to take place because you appear to be advising your client that there "is no freight train coming". You still have not discovered who your client is dealing with.

THIS IS AN EASY CASE TO SETTLE

Based upon your client capitalization, you cannot save your client a dime by advising your client not to settle with us, you can only cause your client to spend a great deal of money to save a mark "google" which has become "generic". Once Google shareholders learn that Google cannot even maintain a trademark because the name has become "generic", Google's stock won't be worth \$5.00 a share. Your law firm won't be the last firm to participate in the total destruction of its client based upon you bad legal advise.

Please provide us with a written Settlement proposal detailing the terms and conditions that would please your client and forward it to us by email and/or fax by Feb. 12, 2006.

If you have any questions please call me at 708-453-0080.

This is an easy case to settle. Just make us a reasonable monetary settlement offer and we will can resolve this matter for once and for all times.

We look forward to hearing from you.

Most cordially,

/Leo Stoller/  
www.rentamark.com

>CONFIDENTIALITY NOTICE RULE 408 CAL. R. Evid 1152

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---

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<http://toolbar.msn.click-url.com/go/onm00200415ave/direct/01/>



# **EXHIBIT S**

Google's mark are Generic and will be canceled! .txt  
From: L Lee [ldms4@hotmail.com]  
Sent: Thursday, March 02, 2006 1:49 PM  
To: Michael T Zeller  
Subject: Google's mark are Generic and will be canceled!

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Evid. Code 1152

Michael Zeller:

The freight train has arrived!

Until now your silence was deafening. But at least now your client will not any longer ignore us. You client will not be able to ignore my motions, my discovery requests, my notices of depositions etc my motion for summary judgment... neither will the press. I expect to be hearing from you shortly and regularly unless you plan on ignoring filing Google's answer.....One lesson that Google is going to learn...you do not ignore STOLLER when he calls, especially when you invite him to the table...as in the case at bar.  
Please conduct your self according to the California Rules of Professional Conduct because I would not want to file any disciplinary complaints against each and every partner in every city where your firms practices, should you violate any rules of ethics. See [www.rentamark.com/aeae](http://www.rentamark.com/aeae)

It does not surprise me that your client wanted to provoke this controversy into a full blown Trademark Trial and Appeal Board public proceeding and risk Google's most valuable asset, its trademark and Registration. Because Google loves to read about itself in the papers:

"RENTAMARK PETITIONS TO CANCEL GOOGLE'S TRADEMARKS

Today Google's stock took a turn for the worst as now its very mark is the subject of a Petition to Cancel Proceeding. Google's mark has become a verb and now is the subject of a Trademark Trial and Appeal Board Cancellation proceeding. Mr. Zeller, Google's attorney would not comment on the case until he sees the complaint."

Mr. Zeller you wanted this controversy, you provoked it, you refused to deal in good faith to reach an amicable settlement and now Google has the opportunity to defend its mark in the public square and in a Petition to Cancel Proceeding and in an Opposition. Good Job! Just what you wanted, right! Now everyone will get to see exactly just how good a trademark lawyer are you. Right!

Congratulations, "let the game begin..." We have been practicing for this contest for 37 years, this will be our 389th inter party proceeding, we look forward to seeing just how good you are. May the best man win! Remember to play by the rules "nothing below the belt" otherwise you and all of your partners can spend their time at the appropriate disciplinary commissions defending their unethical actions. Remember Mr. Zeller I am also an Expert in attorney ethics issues for over 25 years.

Quite frankly the pocket change that we requested to settle this matter was not worth it. I would rather see a mark that does not belong on the principle register canceled than be bought off for such pocket change.  
Google's mark does not belong on the principle register any longer. And I am going to see that it is removed from the principle register!

Let's see how much farther you can drive down Google stock price! Then in the end we measure the cost of settling today with the actual cost to Google to defend itself....Then we can determine who is the actual winner in this controversy is....it won't be Google, because Google can't win as well known to you. Google can only loose....please mark the price of Google's stock today, remember that

Google's mark are Generic and will be canceled! .txt  
figure...and we will compare it with Google's stock price when the final court speaks...At the current rate of Google's collapsing stock price, I would not be surprised if Google goes out of business by the conclusion of this proceeding...Then Mr. Zeller you can continue to say, "we didn't give Stoller a dime!" And any one who may be left at Google will tell you Mr. Zeller "what a good job you did, are jobs are gone, but you did a real good job" even though the patient died...

Just remember Google lost the day they invited me to the table and refused to make a good faith effort to resolve this matter.....

Most Cordially,

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