

**RECEIVED UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

MAR 29 2007

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO.  
ST. LOUIS  
St. Louis Cardinals LLC

\_\_\_\_\_, )  
**Plaintiff,** )

v. )

Douglas J. Lewis d/b/a STL PRODUCTS )  
\_\_\_\_\_, )

**Defendant,** )  
\_\_\_\_\_ )

**Case #**

**407CV00473DDN**

**DEFENDANTS REPLY MEMORANDUM**

Mr. Doug Lewis having its principal address at 4143 Fox Crossing St. Louis, Mo 63034  
In "further" answering the Notice / Summons filed by Plaintiff, The St. Louis Cardinals  
LLC,

Defendant says as follows:

From: Mr. Douglas Lewis  
4143 Fox Crossings  
St. Louis, Mo 63034  
314 341-8567

To: Missouri Secretary of States Office  
P.O.Box 784  
Jefferson city. MO 65102

Date: March 28, 2007

Re: **Cancellation of below listed marks based on "Coercion" and "Discrimination".**

Based on "coercion" and "discrimination" from the St. Louis Cardinals Legal Team and its attorneys, who wish to capitalize on Mr. Lewis' legally registered Trademarks/Service marks listed below, who wish to obtain registration for themselves (St. Louis Cardinals) either directly or indirectly by use of agents or representatives.

Mr. Lewis Upon information and belief, believes the St. Louis Cardinals and its attorneys, who has in the past disallowed and band Mr. Lewis' products, calling them bootlegged, unauthorized and unofficial, now comes

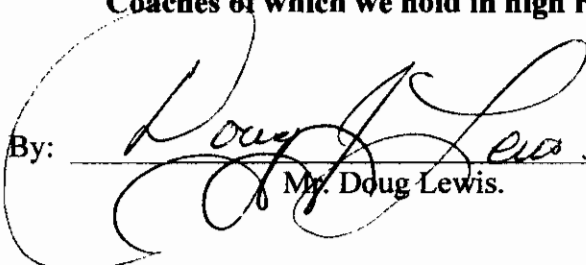
in a discriminatory effort to monopolize and single out Mr. Lewis' registered products and shut down his small business.

Mr. Lewis is forced to request the below Trademarks / Service marks be cancelled.

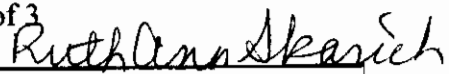
It must be noted the Cardinals had not registered or granted the official MLB SEAL to the below listed Trademarks/Service marks or "Agents" that they now wish to capitalize on and endorse.

- |   |                         |
|---|-------------------------|
| (1) Go Cards St. Louis Baseball,        | Registration No. 016927 |
| (2) St. Louis Baseball                  | Registration No. S16273 |
| (3) Card Ball                           | Registration No. S15724 |
| (4) Card Ball Bird                      | Registration No. S15778 |
| (5) Red Bird Design with Baseball Glove | Registration No. S15746 |

**It must be noted that the unethical behavior on the part of St. Louis Cardinals Legal Team does not reflect negatively on the St. Louis Cardinals Players, Managers or Coaches of which we hold in high regards.**

By:   
Mr. Doug Lewis.

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**RUTH ANN SKORICH**  
Notary Public - Notary Seal  
STATE OF MISSOURI  
St. Louis County  
My Commission Expires: April 5, 2008

## Jury Trial Requested

### Per the United States Constitution Bill of Rights

#### Amendment VII

In suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise reexamined in any court of the United States, than according to the rules of the common law.

cc.

St. Louis Chan 2 NEWS

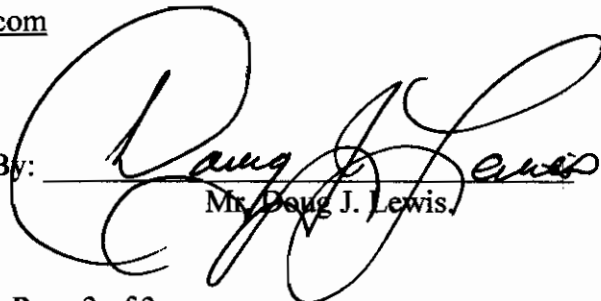
#### CERTIFICATE OF MAILING AND SERVICE

I certify that on March 29, 2007 an original of Defendants Response is being deposited with the United States Postal Service as First Class Mail in an envelope to:

Nicholas B. Clifford, Jr  
Armstrong Teasdale LLP  
One Metropolitan Square,  
Suite 2600  
Florissant, MO 63034  
314-621-5070  
Fax: 314 621-5065  
Email: [nclifford@armstrongteasdale.com](mailto:nclifford@armstrongteasdale.com)

Dated: March 29, 2007

By:



Mr. Doug J. Lewis

From: Mr. Douglas Lewis  
4143 Fox Crossings  
St. Louis, Mo 63034  
314 341-8567

To: Secretary of States Office  
Trademark Division, Dept of Business  
3<sup>rd</sup> Floor Howlett Building  
Springfield, Illinois 62756  
217 524-0400

Date: March 28, 2007

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- |                               |                        |
|-------------------------------|------------------------|
| (1) Illinois Cardinals,       | Registration No. 89156 |
| (2) East St. Louis Cardinals, | Registration No. 89212 |

**It must be noted that the unethical behavior on the part of St. Louis Cardinals Legal Team does not reflect negatively on the St. Louis Cardinals Players, Managers or Coaches of which we hold in high regards.**

By: \_\_\_\_\_

Mr. Doug Lewis

*Ruth Ann Skorich*

