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Filing date: **11/06/2017**

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

| | |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| Proceeding | 91229513 |
| Party | Plaintiff Right Connection, Inc. |
| Correspondence Address | GREGORY P GOONAN THE AFFINITY LAW GROUP 5755 OBERLIN DRIVE, SUITE 200 SAN DIEGO, CA 92121 UNITED STATES Email: ggoonan@affinity-law.com |
| Submission | Plaintiff's Notice of Reliance |
| Filer's Name | Gregory P. Goonan |
| Filer's email | ggoonan@affinity-law.com |
| Signature | /gregory p. goonan/ |
| Date | 11/06/2017 |
| Attachments | 2017_11_06 Plt Notice Reliance.pdf(56624 bytes) Exhibits_Combined.pdf(4242509 bytes) |

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

| | |
|-------------------------|-----------------------------------------------|
| RIGHT CONNECTION, INC., |) OPPOSITION NO. 91229513 |
| |) |
| Opposer, |) |
| v. |) Mark: PLAYCOUPLES |
| |) |
| ROBERT L. MCGINLEY, |) Application Serial No.: 86877408 |
| |) Filed: January 15, 2016 |
| Applicant. |) Published: June 14, 2016 |
| |) |
| |) Plaintiff's Testimony Period Ends: November |
| |) 4,2017 |
| |) |
| |) |

OPPOSER'S NOTICE OF RELIANCE - DOCUMENTARY EVIDENCE

PLEASE TAKE NOTICE that opposer Right Connection, Inc. ("Right Connection") offers into evidence, and will rely upon, the documentary evidence submitted as exhibits with this Notice of Reliance. Set forth below is a description of each exhibit upon which Right Connection will rely and a statement setting forth the issue(s) to which each exhibit is relevant.

| <u>Exhibit No.</u> | <u>Description</u> | <u>Relevance</u> |
|--------------------|---------------------------|--------------------------------------------------------------------------------------|
| 1. | 2008 Complaint | background; history of dealings between parties; 2016 settlement agreement; priority |
| 2. | 2008 settlement agreement | background; history of dealings between parties; 2016 settlement agreement; priority |

| | | |
|-----|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| 3. | LSO, Ltd. Certificate of Winding Up & Dissolution | background; history of dealings between parties; 2016 settlement agreement; priority |
| 4. | Trademark assignment | background; history of dealings between parties; 2016 settlement agreement; priority |
| 5. | 2013 Complaint | background; history of dealings between parties; 2016 settlement agreement; priority |
| 6. | 2013 settlement agreement | background; history of dealings between parties; 2016 settlement agreement; priority |
| 7. | 2015 Complaint | background; history of dealings between parties; 2016 settlement agreement; priority |
| 8. | 2016 settlement agreement | background; history of dealings between parties; 2016 settlement agreement; priority; fraud on PTO |
| 9. | Domain registration for www.PlaycouplesTravel.com | priority; fraud on PTO |
| 10. | Print-out of pages from original version of www.PlaycouplesTravel.com website | priority; fraud on PTO |
| 11. | Print-out of pages from current version of www.PlaycouplesTravel.com website | priority; fraud on PTO |

| | | |
|-----|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| 12. | Sales invoices | priority; fraud on PTO |
| 13. | Articles of Incorporation of LSO, Ltd. | background; history of dealings between parties; 2016 settlement agreement; priority |
| 14. | Certificate of Dissolution | background; history of dealings between parties; 2016 settlement agreement; priority |
| 15. | LinkedIn post | background; priority |
| 16. | Nevada Secretary of State print-out | background; priority |
| 17. | TESS print-out re history and status of Trademark Application Serial No. 75371926 | background; priority |
| 18. | TESS print-out re history and status of Trademark Application Serial No 75371925 | background; priority |

DATED: November 6, 2017

THE AFFINITY LAW GROUP

By: /s/ Gregory P. Goonan

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Right Connection, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of this document has been served on Applicant by a sending a copy of the document to Allan B. Gelbard, counsel for Applicant, via electronic mail to the following email address on the date stated: XXXesq@aol.com

Dated: November 6, 2017

By: /s/ Gregory P. Goonan



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