December 6, 2019

Shenzhen Yunjie Technology Co., Ltd.
601, 6th Floor, No. 90, Lane 5,
Hekan Village, Yutian Street,
Longgang District, Shenzhen, China 518129

Re: Serial Nos. 88576053 and 88582601

SHOW CAUSE ORDER

Dear Officer of Shenzhen Yunjie Technology Co., Ltd.:

It has come to the attention of the United States Patent and Trademark Office (USPTO) that U.S. Application Serial Nos. 88576053 and 88582601 set forth false information in connection with the requirements of 37 C.F.R. § 2.11(a). Specifically, the Application forms submitted on August 12, 2019 and August 16, 2019 ("offending papers") falsely designated an attorney named Xiaoyang Fiona Wang, as the attorney of record and correspondent.¹

Therefore, as explained below, the USPTO is considering striking the offending papers, affecting the weight given to the offending papers, precluding the applicant from submitting or presenting additional documents, or terminating the proceedings in connection with the application. This show-cause order is part of a proceeding that may affect the registrability of the mark and thus constitutes good and sufficient cause to suspend examination of the applications. See 37 C.F.R. § 2.67. Accordingly, the USPTO may suspend action on the above-referenced applications pending a response to this order.

Relevant Rules of Practice in Trademark Cases Before the USPTO

Under the USPTO's rules of practice, an applicant, registrant, or party to a trademark proceeding whose domicile is not located within the United States or its territories must be represented at the USPTO by an attorney who is an active member in good standing of the bar of the highest court of a U.S. state or territory. See 37 C.F.R. §§ 2.11(a), 11.1,

¹ The public may view and print images of the contents of trademark application and registration records through the Trademark Status and Document Retrieval (TSDR) database on the USPTO website at http://tsdr.uspto.gov/.
11.14(a). Thus, all foreign-domiciled trademark applicants must designate a U.S.-licensed attorney who will file trademark-related submissions with the USPTO. See 37 C.F.R. §§ 2.11(a), 2.18(a), 2.193(e). When an attorney is appointed, the USPTO will correspond only with the attorney. 37 C.F.R. § 2.18(a).

Providing false, fictitious, or fraudulent information in connection with the requirement for U.S. counsel is considered submitting a paper for an improper purpose in violation of 37 C.F.R. § 11.18(b) and is subject to the sanctions and actions set forth in 37 C.F.R. § 11.18(c). See 37 C.F.R. § 2.11(e). Those sanctions and actions include striking the offending paper, terminating the proceedings, or other actions deemed appropriate under the circumstances. 37 C.F.R. § 11.18(c).

Furthermore, under 37 C.F.R § 11.18(b), the party presenting a document to the USPTO whether by signing, filing, or submitting it, is certifying that all statements made therein of the party’s own knowledge are true, all statements made on information and belief are believed to be true, and all statements are made with the knowledge that knowingly and willfully making false, fictitious, or fraudulent statement or presentations is subject to penalties set forth under 18 U.S.C. § 1001, and may jeopardize the probative value of the paper.

**Impero Designation of Attorney of Record**

The above-referenced applications designate an owner address that is located outside of the United States or its territories. Thus, the applicant is foreign-domiciled and must be represented by a U.S.-licensed attorney. 37 C.F.R. § 2.11(a).

A submission in each application record set forth the name “Xiaoyang Fiona Wang” as both the attorney of record and correspondent. The submissions also include bar membership information consistent with Ms. Wang’s admission to the North Carolina State Bar, but set forth the mailing and email addresses of a third-party.

Although Ms. Wang is a U.S.-licensed attorney who may practice before the USPTO in trademark matters, she has informed the USPTO that (i) she is not the attorney of record in the application; (ii) she did not consent to be listed as such; (iii) she has no ongoing relationship with the applicant named in the application; (iv) she has never used the email address listed in the application; and (v) her legal practice is not located at the address listed for correspondence in the application. Please see the attached supporting declaration from Ms. Wang.

**Show Cause Requirement**

The Commissioner for Trademarks possesses the authority to manage and direct all aspect of the activities of the USPTO that affect the administration of trademark operations. See 35 U.S.C. §§ 2, 3; TMEP § 1709. This includes the authority to impose sanctions on parties who submit a paper in a trademark matter for an improper purpose. See 35 U.S.C. § 3(b)(2)(A); 37 C.F.R. §§ 2.11(a), (e), 11.18(b)(2), (c).
In this case, the evidence indicates that a submission in each application record sets forth false and possibly fraudulent information. Specifically, the above-referenced offending papers list Xiaoyang Fiona Wang as the attorney of record without her knowledge or consent. The circumstances suggest that the information was knowingly provided to the USPTO for the improper purpose of circumventing the requirement for U.S. counsel, in violation of 37 C.F.R. § 2.11(e) and 37 C.F.R. §11.18(b). Accordingly, the applicant is subject to the sanctions and actions provided in 37 C.F.R. §11.18(c).

In view of the foregoing, the applicant is hereby ordered to show cause why the USPTO should not strike the offending papers, affect the weight given to the offending papers, preclude the applicant from submitting or presenting additional documents, or terminate the proceedings. The USPTO will consider the applicant's response in determining the appropriate sanctions. If each application proceeding is terminated, no further examination of the applications will occur, and the USPTO's records will be updated to indicate that each application has been terminated.

The applicant's showing must include detailed answers to the following request for information:

(1) Explain the circumstances surrounding the preparation and filing of the offending papers identified above. Please also identify who prepared these documents and who filed them.

(2) Explain the applicant's relationship with Xiaoyang Fiona Wang. If applicant believes that Ms. Wang agreed to represent the applicant before the USPTO in this application, state the basis for such belief and provide any supporting documents.

The response must be received at the following address on or before the close of business within 45 days of the date of this letter.

U.S. Patent and Trademark Office
Commissioner for Trademarks
Attn: Administrator for Trademark Policy & Procedure
600 Dulany Street
Madison Building East, 10th Floor
Alexandria, Virginia 22313-1450

Or via e-mail to TMPolicy@uspto.gov.

The response must explicitly identify the sender and his/her relationship to the applicant. The response must come from an officer of the juristic applicant, or an attorney qualified to represent the applicant under 37 C.F.R. §11.14(a).
Failure to timely respond or failure to overcome the evidence that the offending papers were submitted for an improper purpose will result in the USPTO undertaking one or more of the actions specified above.

Sincerely,

Mary Boney Denison
Commissioner for Trademarks
Ms. Xiaoyang (Fiona) Wang  
Law Office of Fiona Wang, PLLC  
1750 NW Maynard Road, Ste. 100-16  
Cary, NC 27513  
United States

United States Patent & Trademark Office  
Office of the Deputy Commissioner for Trademark Examination  
P.O. Box 1451  
Alexandria, Virginia 22313-1451  
United States of America

Pursuant to 28 U.S.C. §1746 and 37 C.F.R. §2.20, I, Xiaoyang Wang, declare the following:

1. I am a licensed attorney in good standing with the State Bar of North Carolina, and an inactive attorney with the State Bar of New York. I was admitted by North Carolina State Bar in 2016.
2. I have been made aware by the USPTO that my name was listed as an attorney on record/correspondent/signatory in about fifty trademark applications before the USPTO, the list of which were identified and provided to me by USPTO in attached Exhibit A. Applications/Registrations Listing Xiaoyang Fiona Wang as the Attorney of Record (hereinafter as “Exhibit A”).
3. I am not aware of any other person with the name “Xiaoyang Wang” authorized to represent others before the USPTO.
4. I do not practice in trademark law, and have never represented any party in a trademark matter before the USPTO.
5. I do not and have never filed any trademark application or registration documents with the USPTO as of September 18, 2019.
6. I do not and have never agreed to serve as an attorney/correspondent/signatory for trademark applications or registrations before the USPTO on behalf of any party before the USPTO as of September 18, 2019.
7. I do not maintain any mailing address at 1601 Walnut St, Suite 201, Cary NC 27511.
8. I do not and have never used the email address “mengsustone@gmail.com”, “lishilian@ytcip.com”, or “888@ytcip.com”, which I understand appear as email address associated with Law Office of Fiona Wang, PLLC and/or my name in many U.S. Trademark applications and registrations.
9. I do not have any ongoing affiliation and have never had any past affiliation with Xue Chaoxing of Xiamen, China, which I understand appear as the applicant associated with
Law Office of Fiona Wang, and/or my name in many U.S. trademark applications and registrations.

10. I do not have any ongoing affiliation and have never had any past affiliation with Hardkoo Wu, or Huaguo Wu of Shenzhen China, which I understand appear as the trademark applicant/owner associated with Law Office of Fiona Wang, and/or my name in many U.S. trademark applications and registrations.

11. I do not and have never intended to represent any identified applicant or registrant as involved in the identified U.S. trademarks and registrations filed with USPTO as listed in Exhibit A, which was associated with Law Office of Fiona Wang, PLLC, and/or my name, as of the date of September 18, 2019.

12. To the best of my knowledge, there is no reason for my name or signature to appear on any filing in connection with any of the identified trademark applications or registrations as listed in attached Exhibit A, as I am not aware of any identified applicant and their identified trademark applications until being notified by the USPTO officer.
   a. I do not have any association with or connection to any of the owners listed in these trademark applications or registrations as listed in attached Exhibit A;
   b. I do not have the legal authority to bind the owners of these trademark applications or registrations as listed in attached Exhibit A;
   c. I do not have any firsthand knowledge of the facts contained in any identified trademark application, response, amendment to allege use, or other trademark filing associated with these applications or registrations as listed in attached Exhibit A.

13. I respectfully request the assistance of the USPTO to remove my name and correspondence information from the relevant fields of all relevant records filed on or before the date of September 18, 2019.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: September 18, 2019

Xinaoyang Wang
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