



United States Patent and Trademark Office

Office of the Commissioner for Trademarks

July 13, 2022

Fangyuan Wu
Unit 501, Xincheng Building West
Shennan Rd, Futian District
Shenzhen, China 518026

Via Email:

tm201908@outlook.com
iptoday@tom.com
jdtm@jdvat.com

In re Fangyuan Wu

SHOW CAUSE ORDER

Dear Mr. Wu,

The United States Patent and Trademark Office (USPTO or Office) has reason to believe that Fangyuan Wu ("Respondent") has violated the USPTO's rules of practice before the Office in trademark matters. Specifically, Respondent provided false assignments to the USPTO through the Assignment Recordation Branch ("Assignment Branch") in violation of the Rules of Practice in Trademark Cases, the rules governing assignments, recording and the rights of assignees, and the rules governing representation of others before the USPTO. See 37 C.F.R. pts. 2, 3, 11.

Providing false information of any kind in a trademark submission undermines the integrity of the trademark register, and those who provide false, fictitious, or fraudulent information are subject to sanctions. *In re Yusha Zhang*, 2021 TTAB LEXIS 465, at *10, *23-24 (Dir. USPTO Dec. 10, 2021). In particular, providing false, fictitious, and/or or fraudulent documents affecting title to registrations and applications creates serious harm to the integrity of the register, and such actions adversely affect registrants, applicants, the Office and the public, who all rely upon the accuracy of information contained therein. See, e.g., *Chutter, Inc. v. Great Mgmt. Grp., LLC*, 2021 USPQ2d 1001 at *25 (TTAB 2021) ("The agency, as well as applicants and registrants, and all who rely on the accuracy of the Registers of marks and the submissions made to the USPTO in furtherance of obtaining or maintaining registration, must be able to rely on declarations and the truth of their contents."), *appeal filed*, No. 22-1212 (Fed. Cir. Nov. 30, 2021).

This order requires Respondent to show cause as to why the USPTO should not immediately sanction Respondent pursuant to 37 C.F.R. § 11.18(c) and take any necessary measures to protect the integrity of the trademark register as it relates to Respondent's improper filing activities.

I. Relevant Legal Requirements

All submissions to the USPTO in trademark matters are governed by Trademark Statutes and Rules, namely, the Trademark Act, 15 U.S.C. §§ 1051 *et seq.*, and the U.S. Trademark Rules of Practice, 37 C.F.R. pts. 2-3, 6-7, and 11 (collectively, "USPTO Rules").

When ownership of a federal trademark application or registration changes, parties may record an assignment with the USPTO, which affords benefits to the assignee and the public. See, e.g., 15 U.S.C. § 1060(a)(3) (indicating that recordation is prima facie evidence of the execution of an assignment); 37 C.F.R. § 3.73(b) (indicating that establishing ownership enables an assignee to take action in a trademark matter); see also Trademark Manual of Examining Procedure ("TMEP") §§ 812.01, 1207.01 (July 2022)¹ (noting that examining attorneys may rely upon information recorded with the Assignment Branch when making ownership determinations for potentially-conflicting trademark registrations).

All trademark assignments must be both in writing and properly executed; that is, a sale or transfer of all rights in a trademark registration requires a written contract, signed by a party authorized to bind the assignor. See 15 U.S.C. § 1060(a)(3) ("Assignments shall be by instruments in writing duly executed."); cf. *Gaia Techs., Inc. v. Reconversion Techs., Inc.*, 93 F.3d 774, 39 USPQ2d 1826, 1830-31 (Fed. Cir. 1996) (indicating that 15 U.S.C. § 1060 requires more than a demonstrated intent to assign rights in a registered trademark).

The USPTO will record an assignment if the request contains a complete cover sheet² and a document evidencing the transfer of title. 37 C.F.R. §§ 3.11, 3.25, 3.31.³ Generally, changes in ownership records recorded by the Assignment Branch are extracted from the Assignment database and are then mirrored in the Trademark database, which both the public and the USPTO rely upon in making determinations about trademark ownership. See TMEP § 504.02; accord *Fed. Treasury Enter. Sojuzplodoimport v. SPI Spirits Ltd.*, 726 F.3d 62, 107 USPQ2d 1839, 1849 (2d Cir. 2013) ("A clear writing effecting an assignment signals to the parties and the world that the assign is the party that owns the mark and is authorized to exclude others from use.").

The USPTO Rules further require that each piece of correspondence filed in a trademark application or registration, including documents recorded with the Assignment Branch, must be *personally* signed by the named signatory. 37 C.F.R. § 2.193(a). That is, the signature must be either handwritten in permanent ink by the person named as the signatory or submitted

¹ The current and prior versions of the TMEP are available on the USPTO's website at <https://tmep.uspto.gov/RDMS/TMEP/current>.

² A complete request also requires payment of the appropriate fee. See 37 C.F.R. §§ 2.6(b)(6), 3.41(a).

³ A request may include a copy of the original assignment document, but the USPTO will also record an extract of the document evidencing the effect on title, or a statement signed by both the party conveying the interest and the party receiving the interest, explaining how the conveyance affects title. 37 C.F.R. § 3.25(a).

electronically with the named signatory personally entering a combination of letters, numbers, spaces and/or punctuation the signatory has adopted as a signature directly on the electronic submission form. 37 C.F.R. §§ 2.193(a), (c). A person may not delegate the authority to sign trademark-related submissions, and no party may sign the name of another. See *In re Yusha Zhang*, 2021 TTAB LEXIS 465, at *13; *In re Dermahose Inc.*, 82 USPQ2d 1793, 1796 (TTAB 2007); *In re Cowan*, 18 USPQ2d 1407, 1409 (Comm’r Pats. 1990); see also TMEP §§ 611.01(b)-(c).

Finally, any party who presents a trademark submission to the USPTO is certifying that all statements made therein of the party’s own knowledge are true and all statements made therein on information and belief are believed to be true. See 37 C.F.R. § 11.18(b)(1). The party is also certifying that, “[t]o the best of the party’s knowledge, information and belief, formed after an inquiry reasonable under the circumstances, . . . the paper is not being presented for any improper purpose” and “[t]he allegations and other factual contentions have evidentiary support.” 37 C.F.R. § 11.18(b)(2). Thus, knowingly or negligently submitting a document that includes false information, including false statements about assignment of registrations, false signatory information, improperly entered signatures violates 37 C.F.R. § 11.18(b)(1). In addition, submitting such false information to affect the title of a U.S. registration directly undermines the accuracy and integrity of the register, thereby harming registrants as well as the USPTO and the public, and constitutes submitting a document for an improper purpose under 37 C.F.R. § 11.18(b)(2)(i).

II. Fangyuan Wu Willfully Violated USPTO Rules by Filing Falsified Trademark Assignments Containing Improper Signatures

USPTO records indicate that Respondent paid the appropriate fees and filed Trademark Assignment Cover Sheets (“Cover Sheets”) and underlying assignment documents in connection with at least U.S. Registration Nos. 4799837, 4827108, 5883869, 5896671, 6058838, 6069562, and 6076664 for recordation with the Assignment Branch between May 2019 and April 2021. The registrations share no common ownership and identify different marks for use in connection with different goods in a variety of different international classes. However, the assignments are virtually identical in form, and each purports to assign the registrations for no compensation to Fangyuan Wu as assignee. Each recorded assignment bears the signature of an individual identified with a title, such as “owner” or “president,” that would ordinarily signal the authority to bind the assignor, and bears a replica of a notary statement.

Several registrants who were purported parties to some of these assignments have indicated to the USPTO that these assignments were recorded against the registrants’ interests. See attached Exhibits A-C. Disputes and misunderstandings over ownership of a registration sometimes arise, and the USPTO has procedures in place for owners to seek corrections to ownership information.⁴

However, this case involves more than a simple misunderstanding. Several victims of this scheme have declared under penalty of perjury, that: (1) the named individual who allegedly signed the assignment did not have authority to sign any document on behalf of the assignor

⁴ See, e.g., TMEP §§ 503.06(c), 503.06(f), 504.03.

and/or was not employed by the assignor; (2) the named individual, even if properly authorized to sign on behalf of the assignor, was not in China at the time the document was allegedly signed and the principal named did not appear before any notary in China; (3) the subject registration was never assigned to Fangyuan Wu; and (4) the assignors do not know anyone by the name of Fangyuan Wu. See attached Exhibits A-C. Further, while the assignments contain a purported notary statement that indicates that the signatory appeared in China to sign the document, none contain the institutional notarial seal required under Article 32 of the Notarization Law of China (2005).

Based on the foregoing, the USPTO has reason to believe Respondent engaged in a pattern of filing falsified assignments affecting several unrelated registrants in multiple registration records. Each request for recordation contains false, fictitious, or fraudulent information, and the evidence suggests that the assignments were not personally signed nor signed by an individual with authority to bind the registrants. The evidence further suggests that the registrants never authorized the assignments and/or recordation of these documents.

If true, the submission of these documents would violate 37 C.F.R. §§ 2.193(a)–(c), 3.25, and 11.18(b). If the signatures on the underlying instruments conveying title were not personally signed by the named signatories, the documents are ineffective at conveying title and cease to be documents appropriate for recordation. Further, filing false, fictitious, and/or fraudulent documents affecting title constitutes submission of papers for an improper purpose because such documents materially alter USPTO records in a manner that harms the public, the USPTO, and registrants by tampering with apparent chain of title and creating doubt as to proper ownership of the marks.⁵ Moreover, the submission of improper assignments creates additional unnecessary cost and work for both registrants and the Office because affected registrants ordinarily must spend time and money to rectify the situation and the USPTO must review, record, and address both the improper and countervailing submissions.⁶ Therefore, the available information indicates that these submissions were filed in violation of the USPTO Rules. See, e.g., 37 C.F.R. §§ 11.18(b)(1), (b)(2).

In addition, this conduct appears to be a misuse of USPTO computer systems. Users who file documents with the Assignment Branch are warned that “[u]nauthorized use of this service, which includes providing false or spurious information such as false or improper assignment documents . . . is a misrepresentation to the federal government” and may result in sanctions under 37 C.F.R. § 11.18(c), as well as potential criminal prosecution under 18 U.S.C. § 1001.

⁵ While recordation of an assignment is merely a ministerial act, see TMEP § 503.01(c), an assignee may be issued a certificate of registration which may serve as prima facie evidence of the owner’s ownership of the mark. See 15 U.S.C. § 1057(b)(c). Thus, an improper assignment may create a false presumption of ownership, if it goes unaddressed.

⁶ For example, the owners of U.S. Registration Nos. 6058838 and 6076664 filed Petitions to the Director under 37 C.F.R. §2.146 in order to resolve the improper changes to chain of title recorded with the Assignment Branch and have the USPTO records changed to reflect proper ownership of the registrations. Additionally, parties who wish to record a corrective assignment to ensure clear chain of title must pay a fee to the Assignment Branch. See TMEP § 503.06(c).

III. Show Cause Requirement

The Director has authority to sanction those filing trademark submissions in violation of the USPTO Rules and has delegated to the Commissioner for Trademarks the authority to impose such sanctions and to otherwise exercise the Director's authority in trademark matters. 35 U.S.C. § 3(a)-(b); 37 C.F.R. § 11.18(c); *see also Zhang*, 2021 TTAB LEXIS 465, at *10, *23-24. The authority to issue administrative sanctions orders has been further delegated to the Deputy Commissioner for Trademark Examination Policy.

In determining appropriate sanctions, various considerations may be taken into account, including whether the improper conduct was willful, part of a pattern of activity or an isolated event, infected an entire application or one particular submission, the party has engaged in similar conduct in other matters, the conduct was intended to injure, the effect of the conduct on the administrative process in time and expense, and what is needed to deter the conduct by the party and by others. 73 Fed. Reg. 47650, 47653 (2008).

Merely correcting the Trademark database and removing references to the improper assignments in affected records would be an insufficient remedy in this case. Information and evidence available to the Office indicates that Respondent engaged in a pattern of submitting false and fraudulent documents affecting title to the USPTO in multiple registration records with the intent of injuring multiple registrants, the public, and the USPTO itself by rendering the ownership information in the Trademark database inaccurate and unreliable. Each submission in furtherance of this objective appears to violate the USPTO Rules and the website terms of use for filing documents with the Assignment Branch. Serious sanctions are necessary to deter others from engaging in similar egregious conduct, and to prevent Respondent from continuing to flout the USPTO Rules by submitting false and improper documents. *Cf. Zhang*, 2021 TTAB LEXIS 465, at *13.

In view of the foregoing, the USPTO has made a preliminary determination that some or all of the following sanctions are warranted, and Respondent is hereby ordered to show cause why the USPTO should not:

- (1) Permanently preclude Respondent from submitting trademark-related documents on Respondent's own behalf or on behalf of others to the USPTO, including the Assignment Branch;
- (2) Give no weight to the assignment documents submitted by Respondent;
- (3) Remove any correspondence information associated with Respondent from all pending applications and registrations;
- (4) Strike documents, remove information, and terminate proceedings containing submissions later found to have been filed by Respondent;
- (5) Block future financial transactions from credit cards used to pay filing fees associated with the improper submissions and/or associated with Respondent; and
- (6) Direct the USPTO's Office of the Chief Information Officer to permanently deactivate any USPTO accounts in which contact information related to Respondent appears, and to take all reasonable efforts to prevent Respondent from creating or activating further accounts.

The USPTO will consider Respondent's response in determining the appropriate sanctions. The response must establish why the assignments are not false, fictitious, or fraudulent, and explain how Respondent was authorized to file the assignments under the USPTO Rules. The response must include documentary evidence corroborating any factual claims Respondent may make.

A response to this order must be received by 5:00pm (Eastern Time) on July 27, 2022 and must be sent via email to TMPolicy@uspto.gov. Failure to timely respond will result in a presumption that Respondent cannot show that the actions described above did not violate USPTO Rules and the USPTO implementing some or all of the proposed sanctions. This order is issued without prejudice to the USPTO taking all other appropriate actions to protect its systems and users from Respondent's continued improper activity, including issuing additional orders relating to other applications and/or registrations, or referring Respondent's conduct to relevant state and federal law enforcement agencies.

So ordered,

Amy P. Cotton
Deputy Commissioner for Trademark Examination Policy

CERTIFICATE OF SERVICE

I certify that on July 13, 2022, the foregoing Order to Show Cause was emailed to Respondents at the following email addresses:

Email: tm201908@outlook.com;
iptoday@tom.com;
jdtm@jdvat.com

United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Exhibit A

Petition to Director

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	88719817
LAW OFFICE ASSIGNED	LAW OFFICE 118
REGISTRATION NUMBER	6058838
PETITION	
PETITION STATEMENT	<p>The party who filed and signed the recent and only assignment for this mark on behalf of Juvo Pus is not an authorized Juvo Plus party and the assignment is fraudulent and invalid and describes no consideration. Accordingly, such assignment and allegedly new ownership should not be recorded and maintained, and it should be removed from the mark's records. I am the General Counsel and Secretary of Juvo Plus Inc., and I allege and declare under penalty of perjury that I have full authority to bind the company and I have full knowledge and understanding of the following, which I declare as true: The correspondence for the Juvo Plus mark, Glamlily, should only be with me, Alyson Emmer, with email address alyson@juvoplus.com. I do not know or authorize correspondence with dr@kafiling.com or any other third party. Also, as previously indicated, Juvo Plus is the sole and original registrant and owner of the glamlily mark, and it has never assigned the mark to anyone or any third party, and Juvo Plus should still be the sole owner of the mark. Juvo Plus continuously uses the mark in commerce, including, but not limited to sales on Amazon.com. The alleged assignment to an unrelated third party that is currently on record with the USPTO is a fraudulent assignment. In fact, the individual listed on the assignment document fraudulently submitted, Zhao Li, is not the president of Juvo Plus (Steve Neuffer is the CEO as can be evidenced with the California Secretary of State), and this person is not an authorized representative/signatory of Juvo Plus. The CEO, and all other authorized representatives of Juvo Plus Inc. do not know Zhao Li and these individuals do not authorize and have never authorized Zhao Li to act on behalf of or with Juvo Plus Inc. Zhao Li has no authority to bind Juvo Plus. Please correct this fraudulent attempt to assign Juvo Plus' rights and show in your records that Juvo Plus Inc. is still the sole owner of glamlily. We also respectfully request that you warn and investigate this fraudulent activity against future malicious and fraudulent activity that has and will continue to harm Juvo Plus Inc.</p>
MARK SECTION	
MARK	mark
LITERAL ELEMENT	GLAMLILY
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size or color.
OWNER SECTION (current)	
NAME	WU, FANGYUAN
INTERNAL ADDRESS	UNIT 501,XINCHENG BUILDING WEST

MAILING ADDRESS	SHENNAN ROAD,FUTIAN AREA
CITY	SHENZHEN
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	China
OWNER SECTION (proposed)	
NAME	Juvo Plus Inc.
MAILING ADDRESS	245 W. Foothill Blvd.
CITY	Monrovia
STATE	California
ZIP/POSTAL CODE	91016
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	United States
EMAIL	XXXX
LEGAL ENTITY SECTION (current)	
TYPE	individual
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY OF CITIZENSHIP	China
LEGAL ENTITY SECTION (proposed)	
TYPE	corporation
STATE/COUNTRY/REGION/JURISDICTION/U.S. TERRITORY OF INCORPORATION	California
EXPLANATION OF FILING	
<p>The party who filed and signed the recent and only assignment for this mark on behalf of Juvo Pus is not an authorized Juvo Plus party and the assignment is fraudulent and invalid and describes no consideration. Accordingly, such assignment and allegedly new ownership should not be recorded and maintained, and it should be removed from the mark's records. I am the General Counsel and Secretary of Juvo Plus Inc., and I allege and declare under penalty of perjury that I have full authority to bind the company and I have full knowledge and understanding of the following, which I declare as true: The correspondence for the Juvo Plus mark, Glamlily, should only be with me, Alyson Emmer, with email address alyson@juvoplus.com. I do not know or authorize correspondence with dr@kafiling.com or any other third party. Also, as previously indicated, Juvo Plus is the sole and original registrant and owner of the glamlily mark, and it has never assigned the mark to anyone or any third party, and Juvo Plus should still be the sole owner of the mark. Juvo Plus continuously uses the mark in commerce, including, but not limited to sales on Amazon.com. The alleged assignment to an unrelated third party that is currently on record with the USPTO is a fraudulent assignment. In fact, the individual listed on the assignment document fraudulently submitted, Zhao Li, is not the president of Juvo Plus (Steve Neuffer is the CEO as can be evidenced with the California Secretary of State), and this person is not an authorized representative/signatory of Juvo Plus. The CEO, and all other authorized representatives of Juvo Plus Inc. do not know Zhao Li and these individuals do not authorize and have never authorized Zhao Li to act on behalf of or with Juvo Plus Inc. Zhao Li has no authority to bind Juvo Plus. Please correct this fraudulent attempt to assign Juvo Plus' rights and show in your records that Juvo Plus Inc. is still the sole owner of glamlily. We also respectfully request that you warn and investigate this fraudulent activity against future malicious and fraudulent activity that has and will continue to harm Juvo Plus Inc.</p>	
CORRESPONDENCE INFORMATION (current)	
NAME	ALYSON A. EMMER
PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE	alyson@juvoplus.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)	NOT PROVIDED
CORRESPONDENCE INFORMATION (proposed)	
NAME	Alyson A. Emmer
PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE	alyson@juvoplus.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)	NOT PROVIDED
PAYMENT SECTION	

PETITION FEE PER PETITION	100
NUMBER OF CLASSES	1
TOTAL FEES DUE	100
SIGNATURE SECTION	
DECLARATION SIGNATURE	/Alyson Emmer/
SIGNATORY'S NAME	Alyson Emmer
SIGNATORY'S POSITION	Attorney of record
DATE SIGNED	09/29/2020
PETITION SIGNATURE	/Alyson Emmer/
SIGNATORY'S NAME	Alyson Emmer
SIGNATORY'S POSITION	/Alyson Emmer/
DATE SIGNED	09/29/2020
AUTHORIZED SIGNATORY	YES
FILING INFORMATION SECTION	
SUBMIT DATE	Tue Sep 29 16:05:46 ET 2020
TEAS STAMP	USPTO/PGP-XXXX:XX:XXXX:XX XX:XXXX:XXXX:XXXX:XXXX-20 200929160546748186-887198 17-75015f49ffb8b9a9c4f58f 68a7d4a732648da9e83c0df76 9f153aaf8c11ac6f9a-CC-054 55873-2020092915432930030 2

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PTO Form 2301 (Rev 02/2020)
OMB No. 0651-0054 (Exp 12/31/2020)

Petition to Director

To the Commissioner for Trademarks:

Application serial no. **88719817** GLAMLILY(Standard Characters, see <https://tmng-al.uspto.gov/resting2/api/img/88719817/large>) has been amended as follows:

PETITION

Petition Statement

The party who filed and signed the recent and only assignment for this mark on behalf of Juvo Pus is not an authorized Juvo Plus party and the assignment is fraudulent and invalid and describes no consideration. Accordingly, such assignment and allegedly new ownership should not be recorded and maintained, and it should be removed from the mark's records. I am the General Counsel and Secretary of Juvo Plus Inc., and I allege and declare under penalty of perjury that I have full authority to bind the company and I have full knowledge and understanding of the following, which I declare as true: The correspondence for the Juvo Plus mark, Glamlily, should only be with me, Alyson Emmer, with email address alyson@juvoplus.com. I do not know or authorize correspondence with dr@kafiling.com or any other third party. Also, as previously indicated, Juvo Plus is the sole and original registrant and owner of the glamlily mark, and it has never assigned the mark to anyone or any third party, and Juvo Plus should still be the sole owner of the mark. Juvo Plus continuously uses the mark in commerce, including, but not limited to sales on Amazon.com. The alleged assignment to an unrelated third party that is currently on record with the USPTO is a fraudulent assignment. In fact, the individual listed on the assignment document fraudulently submitted, Zhao Li, is not the president of Juvo Plus (Steve Neuffer is the CEO as can be evidenced with the California Secretary of State), and this person is not an authorized representative/signatory of Juvo Plus. The

CEO, and all other authorized representatives of Juvo Plus Inc. do not know Zhao Li and these individuals do not authorize and have never authorized Zhao Li to act on behalf of or with Juvo Plus Inc. Zhao Li has no authority to bind Juvo Plus. Please correct this fraudulent attempt to assign Juvo Plus' rights and show in your records that Juvo Plus Inc. is still the sole owner of glamlily. We also respectfully request that you warn and investigate this fraudulent activity against future malicious and fraudulent activity that has and will continue to harm Juvo Plus Inc.

EXPLANATION OF FILING

The party who filed and signed the recent and only assignment for this mark on behalf of Juvo Plus is not an authorized Juvo Plus party and the assignment is fraudulent and invalid and describes no consideration. Accordingly, such assignment and allegedly new ownership should not be recorded and maintained, and it should be removed from the mark's records. I am the General Counsel and Secretary of Juvo Plus Inc., and I allege and declare under penalty of perjury that I have full authority to bind the company and I have full knowledge and understanding of the following, which I declare as true: The correspondence for the Juvo Plus mark, Glamlily, should only be with me, Alyson Emmer, with email address alyson@juvoplus.com. I do not know or authorize correspondence with dr@kafiling.com or any other third party. Also, as previously indicated, Juvo Plus is the sole and original registrant and owner of the glamlily mark, and it has never assigned the mark to anyone or any third party, and Juvo Plus should still be the sole owner of the mark. Juvo Plus continuously uses the mark in commerce, including, but not limited to sales on Amazon.com. The alleged assignment to an unrelated third party that is currently on record with the USPTO is a fraudulent assignment. In fact, the individual listed on the assignment document fraudulently submitted, Zhao Li, is not the president of Juvo Plus (Steve Neuffer is the CEO as can be evidenced with the California Secretary of State), and this person is not an authorized representative/signatory of Juvo Plus. The CEO, and all other authorized representatives of Juvo Plus Inc. do not know Zhao Li and these individuals do not authorize and have never authorized Zhao Li to act on behalf of or with Juvo Plus Inc. Zhao Li has no authority to bind Juvo Plus. Please correct this fraudulent attempt to assign Juvo Plus' rights and show in your records that Juvo Plus Inc. is still the sole owner of glamlily. We also respectfully request that you warn and investigate this fraudulent activity against future malicious and fraudulent activity that has and will continue to harm Juvo Plus Inc.

OWNER AND/OR ENTITY INFORMATION

The owner proposes to amend the following:

Current: FANGYUAN WU, a citizen of China, having an address of

UNIT 501,XINCHENG BUILDING WEST SHENNAN ROAD,FUTIAN AREA
SHENZHEN,
China

Proposed: Juvo Plus Inc., a corporation of California, having an address of

245 W. Foothill Blvd.
Monrovia, California 91016
United States
Email Address: XXXX

Correspondence Information (current):

ALYSON A. EMMER
PRIMARY EMAIL FOR CORRESPONDENCE: alyson@juvoplus.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): NOT PROVIDED

Correspondence Information (proposed):

Alyson A. Emmer
PRIMARY EMAIL FOR CORRESPONDENCE: alyson@juvoplus.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): NOT PROVIDED

Requirement for Email and Electronic Filing: I understand that a valid email address must be maintained by the owner/holder and the owner's/holder's attorney, if appointed, and that all official trademark correspondence must be submitted via the Trademark Electronic Application System (TEAS).

FEE(S)

Fee(s) in the amount of \$100 is being submitted.

SIGNATURE(S)

Declaration Signature

DECLARATION: The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that, if the applicant submitted the application or allegation of use (AOU) unsigned, all

statements in the application or AOU and this submission based on the signatory's own knowledge are true, and all statements in the application or AOU and this submission made on information and belief are believed to be true.

STATEMENTS FOR UNSIGNED SECTION 1(a) APPLICATION/AOU: If the applicant filed an unsigned application under 15 U.S.C. §1051(a) or AOU under 15 U.S.C. §1051(c), the signatory additionally believes that: the applicant is the owner of the mark sought to be registered; the mark is in use in commerce and was in use in commerce as of the filing date of the application or AOU on or in connection with the goods/services/collective membership organization in the application or AOU; the original specimen(s), if applicable, shows the mark in use in commerce as of the filing date of the application or AOU on or in connection with the goods/services/collective membership organization in the application or AOU; **for a collective trademark, collective service mark, collective membership mark application, or certification mark application**, the applicant is exercising legitimate control over the use of the mark in commerce and was exercising legitimate control over the use of the mark in commerce as of the filing date of the application or AOU; **for a certification mark application**, the applicant is not engaged in the production or marketing of the goods/services to which the mark is applied, except to advertise or promote recognition of the certification program or of the goods/services that meet the certification standards of the applicant. **To the best of the signatory's knowledge and belief, no other persons, except, if applicable, authorized users, members, and/or concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services/collective membership organization of such other persons, to cause confusion or mistake, or to deceive.**

STATEMENTS FOR UNSIGNED SECTION 1(b)/SECTION 44 APPLICATION AND FOR SECTION 66(a) COLLECTIVE/CERTIFICATION MARK APPLICATION: If the applicant filed an unsigned application under 15 U.S.C. §§ 1051(b), 1126(d), and/or 1126(e), or filed a collective/certification mark application under 15 U.S.C. §1141f(a), the signatory additionally believes that: **for a trademark or service mark application**, the applicant is entitled to use the mark in commerce on or in connection with the goods/services specified in the application; the applicant has a bona fide intention to use the mark in commerce and had a bona fide intention to use the mark in commerce as of the application filing date; **for a collective trademark, collective service mark, collective membership mark, or certification mark application**, the applicant has a bona fide intention, and is entitled, to exercise legitimate control over the use of the mark in commerce and had a bona fide intention, and was entitled, to exercise legitimate control over the use of the mark in commerce as of the application filing date; the signatory is properly authorized to execute the declaration on behalf of the applicant; **for a certification mark application**, the applicant will not engage in the production or marketing of the goods/services to which the mark is applied, except to advertise or promote recognition of the certification program or of the goods/services that meet the certification standards of the applicant. **To the best of the signatory's knowledge and belief, no other persons, except, if applicable, authorized users, members, and/or concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services/collective membership organization of such other persons, to cause confusion or mistake, or to deceive.**

Signature: /Alyson Emmer/ Date: 09/29/2020
Signatory's Name: Alyson Emmer
Signatory's Position: Attorney of record

Signature: /Alyson Emmer/ Date: 09/29/2020
Signatory's Name: Alyson Emmer
Signatory's Position: /Alyson Emmer/

The signatory has confirmed that he/she is a U.S.-licensed attorney who is an active member in good standing of the bar of the highest court of a U.S. state (including the District of Columbia and any U.S. Commonwealth or territory); and he/she is currently the petitioner's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S.-licensed attorney not currently associated with his/her company/firm previously represented the petitioner in this matter: the petitioner has revoked their power of attorney by a signed revocation or substitute power of attorney with the USPTO; the USPTO has granted that attorney's withdrawal; the petitioner has filed a power of attorney appointing him/her in this matter; or the petitioner's appointed U.S.-licensed attorney has filed a power of attorney appointing him/her as an associate attorney in this matter.

Mailing Address: ALYSON A. EMMER

245 W. FOOTHILL BLVD.
MONROVIA, California 91016
Mailing Address: Alyson A. Emmer
245 W. FOOTHILL BLVD.
MONROVIA, California 91016

RAM Sale Number: 88719817

RAM Accounting Date: 09/29/2020

Serial Number: 88719817

Internet Transmission Date: Tue Sep 29 16:05:46 ET 2020

TEAS Stamp: USPTO/PGP-XXXX:XX:XXXX:XXXX:XXXX:XXXX:XX

XX:XXXX-20200929160546748186-88719817-75

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0df769f153aaf8c11ac6f9a-CC-05455873-2020

0929154329300302

Exhibit B

Petition to Director

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	88628904
LAW OFFICE ASSIGNED	LAW OFFICE 127
REGISTRATION NUMBER	6076664
PETITION	
PETITION STATEMENT	The party who filed and signed the recent and only assignment for this mark on behalf of Coulter Technology, LLC is not an authorized Coulter Technology, LLC party and any assignment filed is fraudulent and invalid
MARK SECTION	
MARK	mark
LITERAL ELEMENT	OCEAN COVE
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size or color.
OWNER SECTION (current)	
NAME	WU, FANGYUAN
INTERNAL ADDRESS	UNIT 501,XINCHENG BUILDING WEST
MAILING ADDRESS	SHENNAN ROAD,FUTIAN AREA
CITY	SHENZHEN
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	China
OWNER SECTION (proposed)	
NAME	Coulter Technology, LLC
MAILING ADDRESS	127 Coulter Avenue
CITY	Ardmore
STATE	Pennsylvania
ZIP/POSTAL CODE	19003
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	United States
EMAIL	XXXX
LEGAL ENTITY SECTION (current)	
TYPE	individual
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY OF CITIZENSHIP	China

LEGAL ENTITY SECTION (proposed)	
TYPE	limited liability company
STATE/COUNTRY/REGION/JURISDICTION/U.S. TERRITORY WHERE LEGALLY ORGANIZED	Delaware
EXPLANATION OF FILING	
<p>The party who filed and signed the recent and only assignment for this mark on behalf of Coulter Technology, LLC is not an authorized Coulter Technology, LLC party and any assignment filed is fraudulent and invalid. Accordingly, such assignment and allegedly new ownership should not be recorded and maintained, and it should be removed from the mark's records. Please see the attached declaration from Eric Lopoten, Secretary for Coulter Technology, LLC declaring under penalty of perjury that Fangyuan Wu has no connection to Coulter Technology, LLC and that the assignment is fraudulent. Also, as previously indicated, Coulter Technology, LLC is the sole and original registrant and owner of the OCEAN COVE mark and registration (Reg. No. 6076664), and it has never assigned the mark to Fangyuan Wu or any parties related to Fangyuan Wu. Therefore, Coulter Technology, LLC is still be the sole owner of the mark. The alleged assignment to an unrelated third party that is currently on record with the USPTO is a fraudulent assignment. In fact, as Fangyuan Wu has no relationship to Coulter, Fangyuan Wu has no authority to bind Coulter Technology, LLC. Please correct this fraudulent attempt to assign Coulter Technology, LLC's rights and update USPTO records to show that Coulter Technology, LLC is the sole owner of OCEAN COVE. We also respectfully request that you warn and investigate this fraudulent activity against future malicious and fraudulent activity that has and will continue to harm Coulter Technology, LLC.</p>	
EVIDENCE SECTION	
EVIDENCE FILE NAME(S)	
ORIGINAL PDF FILE	evi_6515411486-162014496_20210601162206263.pdf
CONVERTED PDF FILE(S) (1 page)	\\TICRS\EXPORT18\IMAGEOUT_18\886\289\88628904\xml7\ PDR0002.JPG
CORRESPONDENCE INFORMATION (current)	
NAME	Scott M. Sisun, Esq.
PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE	scott@sisunlaw.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)	paralegal@sisunlaw.com
CORRESPONDENCE INFORMATION (proposed)	
NAME	Scott M. Sisun, Esq.
PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE	scott@sisunlaw.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)	paralegal@sisunlaw.com
PAYMENT SECTION	
PETITION TO DIRECTOR FEE	250
NUMBER OF CLASSES	1
TOTAL FEES DUE	250
SIGNATURE SECTION	
DECLARATION SIGNATURE	/scottsisun/
SIGNATORY'S NAME	Scott Sisun
SIGNATORY'S POSITION	Attorney of Record, NY Bar member
DATE SIGNED	06/02/2021
SIGNATURE METHOD	Sent to third party for signature
PETITION SIGNATURE	/scottsisun/
SIGNATORY'S NAME	Scott Sisun
SIGNATORY'S POSITION	Attorney of Record, NY bar member

DATE SIGNED	06/04/2021
ROLE OF AUTHORIZED SIGNATORY	Authorized U.S.-Licensed Attorney
SIGNATURE METHOD	Sent to third party for signature
FILING INFORMATION SECTION	
SUBMIT DATE	Fri Jun 04 13:27:55 ET 2021
TEAS STAMP	USPTO/PGP-XX.XXX.XXX.XX-2 0210604132755861368-88628 904-7809ca55d81fa7fd18651 7e8cc297184ce72cd2e91eef8 1aec8de6cebdf4b27df-CC-27 502122-202106011620144969 59

PTO-2301
Approved for use through 03/31/2024. OMB 0651-0054
U.S. Patent and Trademark Office; U.S. DEPARTMENT OF COMMERCE
Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number

Petition to Director

To the Commissioner for Trademarks:

Application serial no. **88628904** OCEAN COVE(Standard Characters, see <https://tmng-al.uspto.gov/resting2/api/img/88628904/large>) has been amended as follows:

PETITION

Petition Statement

The party who filed and signed the recent and only assignment for this mark on behalf of Coulter Technology, LLC is not an authorized Coulter Technology, LLC party and any assignment filed is fraudulent and invalid

EXPLANATION OF FILING

The party who filed and signed the recent and only assignment for this mark on behalf of Coulter Technology, LLC is not an authorized Coulter Technology, LLC party and any assignment filed is fraudulent and invalid. Accordingly, such assignment and allegedly new ownership should not be recorded and maintained, and it should be removed from the mark's records. Please see the attached declaration from Eric Lopoten, Secretary for Coulter Technology, LLC declaring under penalty of perjury that Fangyuan Wu has no connection to Coulter Technology, LLC and that the assignment is fraudulent. Also, as previously indicated, Coulter Technology, LLC is the sole and original registrant and owner of the OCEAN COVE mark and registration (Reg. No. 6076664), and it has never assigned the mark to Fangyuan Wu or any parties related to Fangyuan Wu. Therefore, Coulter Technology, LLC is still be the sole owner of the mark. The alleged assignment to an unrelated third party that is currently on record with the USPTO is a fraudulent assignment. In fact, as Fangyuan Wu has no relationship to Coulter, Fangyuan Wu has no authority to bind Coulter Technology, LLC. Please correct this fraudulent attempt to assign Coulter Technology, LLC's rights and update USPTO records to show that Coulter Technology, LLC is the sole owner of OCEAN COVE. We also respectfully request that you warn and investigate this fraudulent activity against future malicious and fraudulent activity that has and will continue to harm Coulter Technology, LLC.

EVIDENCE

Original PDF file:

[evi 6515411486-162014496 . 20210601162206263.pdf](#)

Converted PDF file(s) (1 page) [Evidence-1](#)

OWNER AND/OR ENTITY INFORMATION

The owner proposes to amend the following:

Current: FANGYUAN WU, a citizen of China, having an address of

UNIT 501,XINCHENG BUILDING WEST SHENNAN ROAD,FUTIAN AREA
SHENZHEN,
China

Proposed: Coulter Technology, LLC, a limited liability company legally organized under the laws of Delaware, having an address of

127 Coulter Avenue
Ardmore, Pennsylvania 19003
United States
Email Address: XXXX

Correspondence Information (current):

Scott M. Sisun, Esq.
PRIMARY EMAIL FOR CORRESPONDENCE: scott@sisunlaw.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): paralegal@sisunlaw.com

Correspondence Information (proposed):

Scott M. Sisun, Esq.
PRIMARY EMAIL FOR CORRESPONDENCE: scott@sisunlaw.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): paralegal@sisunlaw.com

Requirement for Email and Electronic Filing: I understand that a valid email address must be maintained by the owner/holder and the owner's/holder's attorney, if appointed, and that all official trademark correspondence must be submitted via the Trademark Electronic Application System (TEAS).

FEE(S)

Fee(s) in the amount of \$250 is being submitted.

SIGNATURE(S)

Declaration Signature

DECLARATION: The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that, if the applicant submitted the application or allegation of use (AOU) unsigned, all statements in the application or AOU and this submission based on the signatory's own knowledge are true, and all statements in the application or AOU and this submission made on information and belief are believed to be true.

STATEMENTS FOR UNSIGNED SECTION 1(a) APPLICATION/AOU: If the applicant filed an unsigned application under 15 U.S.C. §1051(a) or AOU under 15 U.S.C. §1051(c), the signatory additionally believes that: the applicant is the owner of the mark sought to be registered; the mark is in use in commerce and was in use in commerce as of the filing date of the application or AOU on or in connection with the goods/services/collective membership organization in the application or AOU; the original specimen(s), if applicable, shows the mark in use in commerce as of the filing date of the application or AOU on or in connection with the goods/services/collective membership organization in the application or AOU; **for a collective trademark, collective service mark, collective membership mark application, or certification mark application**, the applicant is exercising legitimate control over the use of the mark in commerce and was exercising legitimate control over the use of the mark in commerce as of the filing date of the application or AOU; **for a certification mark application**, the applicant is not engaged in the production or marketing of the goods/services to which the mark is applied, except to advertise or promote recognition of the certification program or of the goods/services that meet the certification standards of the applicant. **To the best of the signatory's knowledge and belief, no other persons, except, if applicable, authorized users, members, and/or concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services/collective membership organization of such other persons, to cause confusion or mistake, or to deceive.**

STATEMENTS FOR UNSIGNED SECTION 1(b)/SECTION 44 APPLICATION AND FOR SECTION 66(a)

COLLECTIVE/CERTIFICATION MARK APPLICATION: If the applicant filed an unsigned application under 15 U.S.C. §§ 1051(b), 1126(d), and/or 1126(e), or filed a collective/certification mark application under 15 U.S.C. §1141f(a), the signatory additionally believes that: **for a trademark or service mark application**, the applicant is entitled to use the mark in commerce on or in connection with the goods/services specified in the application; the applicant has a bona fide intention to use the mark in commerce and had a bona fide intention to use the mark in commerce as of the application filing date; **for a collective trademark, collective service mark, collective membership mark, or certification mark application**, the applicant has a bona fide intention, and is entitled, to exercise legitimate control over the use of the mark in commerce and had a bona fide intention, and was entitled, to exercise legitimate control over the use of the mark in commerce as of the application filing date; the signatory is properly authorized to execute the declaration on behalf of the applicant; **for a certification mark application**, the applicant will not engage in the production or marketing of the goods/services to which the mark is applied, except to advertise or promote recognition of the certification program or of the goods/services that meet the certification standards of the applicant. **To the best of the signatory's knowledge and belief, no other persons, except, if applicable, authorized users, members, and/or concurrent users, have the right to use the mark in**

commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services/collective membership organization of such other persons, to cause confusion or mistake, or to deceive.

Signature: /scottsisun/ Date: 06/02/2021
Signatory's Name: Scott Sisun
Signatory's Position: Attorney of Record, NY Bar member
Signature method: Sent to third party for signature

Signature: /scottsisun/ Date: 06/04/2021
Signatory's Name: Scott Sisun
Signatory's Position: Attorney of Record, NY bar member
Signature method: Sent to third party for signature

The signatory has confirmed that he/she is a U.S.-licensed attorney who is an active member in good standing of the bar of the highest court of a U.S. state (including the District of Columbia and any U.S. Commonwealth or territory); and he/she is currently the petitioner's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S.-licensed attorney not currently associated with his/her company/firm previously represented the petitioner in this matter: the petitioner has revoked their power of attorney by a signed revocation or substitute power of attorney with the USPTO; the USPTO has granted that attorney's withdrawal; the petitioner has filed a power of attorney appointing him/her in this matter; or the petitioner's appointed U.S.-licensed attorney has filed a power of attorney appointing him/her as an associate attorney in this matter.

Mailing Address: Scott M. Sisun, Esq.
Sisun Law

135 Madison Avenue, Floor 5
New York, New York 10016

Mailing Address: Scott M. Sisun, Esq.
Sisun Law

135 Madison Avenue, Floor 5
New York, New York 10016

PAYMENT: 88628904
PAYMENT DATE: 06/04/2021

Serial Number: 88628904
Internet Transmission Date: Fri Jun 04 13:27:55 ET 2021
TEAS Stamp: USPTO/PGP-XX.XXX.XXX.XX-2021060413275586
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CC-27502122-20210601162014496959

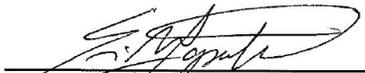
I, Eric Lopoten, Secretary of Coulter Technology, LLC, allege and declare under penalty of perjury that I have full authority to bind the company and I have full knowledge and understanding of the following, which I declare as true:

1. The correspondence for the Coulter Technology, LLC mark, OCEAN COVE (Reg. No. 6076664), should only be with Scott Sisun, our attorney of record, with email address scott@sisunlaw.com.
2. I do not know or authorize correspondence with Fangyuan Wu or any other third party, including Fangyuan Wu.
3. Coulter Technology, LLC has not assigned rights to Fangyuan Wu or any party related to Fangyuan Wu.
4. Fangyuan Wu has no relationship whatsoever with Coulter Technology, LLC, including as an officer or employee of Coulter Technology, LLC.

To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions made above have evidentiary support.

The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Date: 5-30-21



COULTER TECHNOLOGY, LLC
By: Eric Lopoten, Secretary

Exhibit C

Response to Petition to Director Inquiry Letter

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	88628904
REGISTRATION NUMBER	6076664
MARK SECTION	
MARK	https://tmng-al.uspto.gov/resting2/api/img/88628904/large
LITERAL ELEMENT	OCEAN COVE
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size or color.
FORM TEXT	
<p>In support of the petition I hereby state: I am attorney for client, Coulter Technology, LLC (“Coulter”). On April 12, 2021, Fangyuan Wu (“Wu”) fraudulently prepared and filed an assignment agreement with the USPTO in which all rights, interest and goodwill from Coulter to Wu were fraudulently assigned for the Ocean Cove registration (“Assignment”). Wu faked my signature “Scoott M. Sisun” and falsely claimed that I signed the assignment in front of a notary on April 12, 2021 in Guangzhou, China. I did not prepare the Assignment from Coulter to Wu. I did not sign the Assignment from Coulter to Wu. I did not file the Assignment with the USPTO or any other office. I was not in China on April 12, 2021 or at any point in 2021. I did not sign an Assignment in front of a notary on April 12, 2021 in the State of Guangzhou. I am not a "principal" of Coulter. I have no knowledge of Wu or the notary. I have no relationship with or to Wu.</p>	
OWNER SECTION (Current)	
NAME	WU, FANGYUAN
INTERNAL ADDRESS	UNIT 501,XINCHENG BUILDING WEST
MAILING ADDRESS	SHENNAN ROAD,FUTIAN AREA
CITY	SHENZHEN
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	China
EMAIL	XXXX
OWNER SECTION (Proposed)	
NAME	WU, FANGYUAN
MAILING ADDRESS	135 Madison Avenue
CITY	New York
STATE	New York
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	United States

ZIP/POSTAL CODE	10016
EMAIL	XXXX
ATTORNEY INFORMATION (current)	
NAME	Scott M. Sisun, Esq.
ATTORNEY BAR MEMBERSHIP NUMBER	XXX
YEAR OF ADMISSION	XXXX
U.S. STATE/ COMMONWEALTH/ TERRITORY	XX
FIRM NAME	Sisun Law
STREET	135 Madison Avenue, Floor 5
CITY	New York
STATE	New York
POSTAL CODE	10016
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	United States
EMAIL	scott@sisunlaw.com
ATTORNEY INFORMATION (proposed)	
NAME	Scott M. Sisun, Esq.
ATTORNEY BAR MEMBERSHIP NUMBER	XXX
YEAR OF ADMISSION	XXXX
U.S. STATE/ COMMONWEALTH/ TERRITORY	XX
FIRM NAME	Sisun Law
STREET	135 Madison Avenue, Floor 5
CITY	New York
STATE	New York
POSTAL CODE	10016
COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	United States
EMAIL	scott@sisunlaw.com
CORRESPONDENCE INFORMATION (current)	
NAME	Scott M. Sisun, Esq.
PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE	scott@sisunlaw.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)	paralegal@sisunlaw.com
CORRESPONDENCE INFORMATION (proposed)	
NAME	Scott M. Sisun, Esq.
PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE	scott@sisunlaw.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)	paralegal@sisunlaw.com
SIGNATURE SECTION	
DECLARATION SIGNATURE	/scottsisun/
SIGNATORY'S NAME	Scott Sisun
SIGNATORY'S POSITION	Attorney of Record, NY bar member

SIGNATORY'S PHONE NUMBER	3479137800
DATE SIGNED	06/24/2021
SIGNATURE METHOD	Signed directly within the form
SUBMISSION SIGNATURE	/scottsisun/
SIGNATORY'S NAME	Scott Sisun
SIGNATORY'S POSITION	Attorney of record, NY bar member
SIGNATORY'S PHONE NUMBER	3479137800
DATE SIGNED	06/24/2021
ROLE OF AUTHORIZED SIGNATORY	Authorized U.S.-Licensed Attorney
SIGNATURE METHOD	Signed directly within the form
FILING INFORMATION SECTION	
SUBMIT DATE	Thu Jun 24 16:01:36 ET 2021
TEAS STAMP	USPTO/RTP-XX.XXX.XXX.XXX- 20210624160135509178-6076 664-20210624153659127985- N/A-N/A-20210624153659127 985

PTO-2305
Approved for use through 09/30/2021. OMB 0651-0061
U.S. Patent and Trademark Office; U.S. DEPARTMENT OF COMMERCE
Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number

Response to Petition to Director Inquiry Letter

To the Commissioner for Trademarks:

The following is submitted for registration number: **6076664**

FORM TEXT:

In support of the petition I hereby state: I am attorney for client, Coulter Technology, LLC ("Coulter").
On April 12, 2021, Fangyuan Wu ("Wu") fraudulently prepared and filed an assignment agreement with the USPTO in which all rights, interest and goodwill from Coulter to Wu were fraudulently assigned for the Ocean Cove registration ("Assignment"). Wu faked my signature "Scoott M. Sisun" and falsely claimed that I signed the assignment in front of a notary on April 12, 2021 in Guangzhou, China.
I did not prepare the Assignment from Coulter to Wu.
I did not sign the Assignment from Coulter to Wu.
I did not file the Assignment with the USPTO or any other office.
I was not in China on April 12, 2021 or at any point in 2021.
I did not sign an Assignment in front of a notary on April 12, 2021 in the State of Guangzhou.
I am not a "principal" of Coulter.
I have no knowledge of Wu or the notary.
I have no relationship with or to Wu.

The owner proposes to amend the following:

Current: WU, FANGYUAN, having an address of
UNIT 501,XINCHENG BUILDING WEST

SHENNAN ROAD,FUTIAN AREA
SHENZHEN,
China
Email Address: XXXX

Proposed: WU, FANGYUAN, having an address of
135 Madison Avenue
New York, New York 10016
United States
Email Address: XXXX

The owner's/holder's current attorney information: Scott M. Sisun, Esq.. Scott M. Sisun, Esq. of Sisun Law, is a member of the XX bar, admitted to the bar in XXXX, bar membership no. XXX, is located at

135 Madison Avenue, Floor 5
New York, New York 10016
United States

The email address is scott@sisunlaw.com

The owner's/holder's proposed attorney information: Scott M. Sisun, Esq.. Scott M. Sisun, Esq. of Sisun Law, is a member of the XX bar, admitted to the bar in XXXX, bar membership no. XXX, is located at

135 Madison Avenue, Floor 5
New York, New York 10016
United States

The email address is scott@sisunlaw.com

Correspondence Information (current):

Scott M. Sisun, Esq.
PRIMARY EMAIL FOR CORRESPONDENCE: scott@sisunlaw.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): paralegal@sisunlaw.com

Correspondence Information (proposed):

Scott M. Sisun, Esq.
PRIMARY EMAIL FOR CORRESPONDENCE: scott@sisunlaw.com
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): paralegal@sisunlaw.com

Requirement for Email and Electronic Filing: I understand that a valid email address must be maintained by the applicant owner/holder and the applicant owner's/holder's attorney, if appointed, and that all official trademark correspondence must be submitted via the Trademark Electronic Application System (TEAS).

SIGNATURE(S)

Declaration Signature

The signatory being warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application, submission, or any registration resulting therefrom, declares that the facts set forth above are true; all statements made of his/her own knowledge are true; and all statements made on information and belief are believed to be true.

Signature: /scottsisun/ Date: 06/24/2021
Signatory's Name: Scott Sisun
Signatory's Position: Attorney of Record, NY bar member
Signatory's Phone Number: 3479137800
Signature method: Signed directly within the form

Submission Signature

Signature: /scottsisun/ Date: 06/24/2021
Signatory's Name: Scott Sisun
Signatory's Position: Attorney of record, NY bar member
Signatory's Phone Number: 3479137800

Signature method: Signed directly within the form

The signatory has confirmed that he/she is a U.S.-licensed attorney who is an active member in good standing of the bar of the highest court of a U.S. state (including the District of Columbia and any U.S. Commonwealth or territory); and he/she is currently the petitioner's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S.-licensed attorney not currently associated with his/her company/firm previously represented the petitioner in this matter: the petitioner has revoked their power of attorney by a signed revocation or substitute power of attorney with the USPTO; the USPTO has granted that attorney's withdrawal; the petitioner has filed a power of attorney appointing him/her in this matter; or the petitioner's appointed U.S.-licensed attorney has filed a power of attorney appointing him/her as an associate attorney in this matter.

Mailing Address: Scott M. Sisun, Esq.
Sisun Law

135 Madison Avenue, Floor 5
New York, New York 10016

Mailing Address: Scott M. Sisun, Esq.
Sisun Law

135 Madison Avenue, Floor 5
New York, New York 10016

Serial Number: 88628904

Internet Transmission Date: Thu Jun 24 16:01:36 ET 2021

TEAS Stamp: USPTO/RTP-XX.XXX.XXX.XXX-202106241601355

09178-6076664-20210624153659127985-N/A-N

/A-20210624153659127985