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

Proceeding	91215133
Party	Defendant Hannon Group Ltd.
Correspondence Address	HANNON GROUP LTD 5611 381 AVE BURLINGTON, WI 53105 UNITED STATES todd@hannongroup.com, docketing@boylefred.com,ab@boylefred.com
Submission	Response to Board Order/Inquiry
Filer's Name	Todd J. Hannon
Filer's e-mail	todd@hannongroup.com
Signature	/Todd J. Hannon/
Date	08/30/2014
Attachments	91215133 Response to Board Order Inquiry 14.08.28 copy.pdf(296225 bytes ) Exhibit A.pdf(404676 bytes ) Exhibit B.pdf(2624829 bytes ) Exhibit C.pdf(1021825 bytes )

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

Proceeding	91215133
Applicant	Defendant HANNON GROUP Ltd.
Other Party	Plaintiff Reedigroup Limited

**Response to Board requirements in the form of  
Response Due dated August 19, 2014**

The grounds for this request are as follows:

*Hannon Group submits the requested pleadings and documents in support of the motion to suspend proceedings in light of pending civil action.*

*This submission includes the following which are attached.*

- *Exhibit A-- Opposer Reedigroup Limited federal complaint (Milwaukee, Wisconsin Federal Court Case No. 14-CV-309)*
- *Exhibit B—Hannon Group Answer*
- *Exhibit C-- Supply and Manufacturing Agreement*

I have provided an e-mail address herewith for all parties so that any order on this motion may be issued electronically by the Board.

**Certificate of Service**

The undersigned hereby certifies a copy of this letter has been served upon all parties, at their address record by First Class Mail on this date

Respectfully submitted

/Todd J. Hannon/

Todd J. Hannon, President, Hannon Group Ltd.

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08/29/2014

# Exhibit A

Opposer Reedigroup Limited  
federal complaint,  
Federal Court Case No. 14-CV-309

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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REEDIGROUP, LTD.  
303, 3/F, Sam Cheong Building  
216-220 Des Voeux Road, Central  
Hong Kong

and

YAN FANG JIANG  
No. 1402, Central Fortune Plaza  
Nancheng, Dongguan  
Guangdong  
China

Plaintiffs,

vs.

Case No. 14-CV-309

HANNON GROUP, LTD.  
5611 381<sup>st</sup> Ave.  
Burlington, WI 53105

and

TODD J. HANNON  
5611 381<sup>st</sup> Ave.  
Burlington, WI 53105

Defendants.

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**COMPLAINT**

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The plaintiffs, Reedigroup, Ltd. ("Reedigroup") and Yan Fang Jiang ("Jiang"), as and for their complaint against the defendants, allege as follows:

## NATURE OF THE ACTION

1. This is a civil diversity action for breach of fiduciary duty, breach of contract, conversion, civil theft under Wisconsin law and tortious interference with contract, all arising out of a failed business partnership.

## PARTIES

1. The plaintiff, Reedigroup, is a Hong Kong corporation with its principal place of business located at 303, 3/F, Sam Cheong Building, 216-220 Des Voeux Road, Central, Hong Kong.

2. The plaintiff, Jiang, is an adult citizen and resident of China with an address of No. 1402, Central Fortune Plaza, Nancheng, Dongguan, Guangdong, China. Jiang is the sole shareholder of Reedigroup.

3. The defendant, The Hannon Group, Ltd. ("Hannon Group"), is a Wisconsin corporation with a principal place of business and registered agent's office of 5611 381<sup>st</sup> Avenue, Burlington, WI 53105.

4. The defendant, Todd J. Hannon ("Hannon"), is an adult resident of the State of Wisconsin with an address of 5611 381<sup>st</sup> Avenue, Burlington, WI 53105. On information and belief, Hannon is the sole shareholder of Hannon Group. Hannon is also the registered agent for Hannon Group.

## JURISDICTION AND VENUE

1. The Court has jurisdiction pursuant to 28 U.S.C. § 1332(a)(2) in that Jiang is a citizen of China and Reedigroup is a citizen of Hong Kong, and Hannon and Hannon Group are citizens of Wisconsin.

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